

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA

Brian M. Webb v. Lawrence County Housing Authority, et al.

Webb · No. 2:25-CV-597 · Decided December 22, 2025

SUMMARY

The United States District Court for the Western District of Pennsylvania adopted a magistrate judge’s Report and Recommendation and dismissed Brian M. Webb’s civil claims without prejudice. The court applied Heck v. Humphrey and the Prison Litigation Reform Act, concluding that the claims were frivolous, malicious, or failed to state a claim because a favorable judgment would necessarily call into question the validity of Webb’s convictions.

CASE DETAILS

COURT	United States District Court for the Western District of Pennsylvania
WRITING FOR THE COURT	J. Nicholas Ranjan
JURISDICTION	United States District Court for the Western District of Pennsylvania
DECIDED	December 22, 2025
DOCKET	2:25-CV-597
DISPOSITION	dismissed
PROCEDURAL POSTURE	The court reviewed a magistrate judge's Report and Recommendation recommending dismissal of a prisoner's civil-rights complaint under the Prison Litigation Reform Act and Heck v. Humphrey. No objections were filed.
STANDARD OF REVIEW	Clear-error review of the portions of the Report and Recommendation to which no objections were filed.
PRECEDENTIAL VALUE	unpublished

TOPICS

- prisoners rights
- civil rights
- post-conviction relief
- civil procedure

PRACTICE AREAS

- civil rights
- prisoner litigation
- federal civil procedure
- post-conviction-related civil claims

QUESTIONS PRESENTED

1. Whether the court should adopt the magistrate judge's Report and Recommendation when no objections were filed and no clear error appeared on the face of the record.
2. Whether Webb's civil claims were barred by *Heck v. Humphrey* because success on the claims would necessarily imply the invalidity of his prior convictions or imprisonment.
3. Whether the complaint should be dismissed under 28 U.S.C. § 1915(e)(2)(B) as frivolous, malicious, or failing to state a claim.

HOLDINGS

1. When no objections are filed, and the court finds no clear error on the face of the record, the court may adopt the magistrate judge's Report and Recommendation.
2. Claims seeking relief that would necessarily call into question the validity of prior convictions or imprisonment must be dismissed without prejudice unless the convictions or sentences have already been invalidated through an authorized procedure.

KEY QUOTATIONS

“damages for allegedly unconstitutional conviction or imprisonment. . . prove that the conviction or sentence has been reversed on direct appeal, expunged by executive order, declared invalid by a state tribunal authorized to make such determination, or called into question by a federal court’s issuance of a writ of habeas corpus” (512 U.S. at 486-87)

FACTUAL BACKGROUND

Pro se Plaintiff Brian M. Webb alleged civil claims arising from his arrest and incarceration as a parole violator. The recommended disposition was based on the conclusion that success on his claims would necessarily call into question the validity of his prior convictions. The district court dismissed the action without prejudice, permitting refiling if Webb later obtained a favorable termination of the underlying criminal proceedings.

PROCEDURAL HISTORY

Brian M. Webb filed a pro se complaint on March 28, 2025, alleging civil claims arising from his arrest and incarceration as a parole violator. The matter was referred to Magistrate Judge Maureen P. Kelly, who recommended dismissal without prejudice because a favorable judgment would necessarily call into question the validity of Webb's prior convictions. After the objection period expired without objections, the district court found no clear error, adopted the Report and Recommendation, and dismissed the case without prejudice.

DISPOSITION

dismissed

CASES CITED

- *Heck v. Humphrey*, 512 U.S. 477, 486-87 (1994)

OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA BRIAN M. WEBB,)) Plaintiff,)) 2:25-CV-597 vs.)) Hon. J. Nicholas Ranjan LAWRENCE COUNTY HOUSING) A D U I M T U H C O C R H I T I Y O;, and JASON)) Magistrate Judge Maureen P. Kelly) Defendants.) MEMORANDUM ORDER On March 28, 2025, pro se Plaintiff Brian Webb filed a complaint (ECF 5) alleging civil claims arising out of his arrest and incarceration as a parole violator.

The matter was referred to Magistrate Judge Maureen P. Kelly for proceedings in accordance with the Magistrates Act, 28 U.S.C. § 636(b)(1), and the Local Rules of Court applicable to Magistrate Judges. Currently before the Court is a Report & Recommendation (ECF 9) filed by Judge Kelly on August 12, 2025. Judge Kelly recommended that the Court dismiss the case as frivolous, malicious, and/or failing to state a claim upon which relief can be granted, pursuant to the Prison Litigation Reform Act.

28 U.S.C. § 1915(e)(2)(B) (requiring federal courts to screen complaints filed by prisoners proceeding in forma pauperis). Judge Kelly relied on the Supreme Court's decision in *Heck v. Humphrey*, finding that a judgment in Mr. Webb's favor would necessarily call into question the validity of his prior convictions; therefore, his claims should be dismissed without prejudice, allowing for refiling if Mr. Webb were to receive a favorable termination in his underlying criminal proceedings.

512 U.S. 477, 486-87 (1994) (requiring that plaintiffs seeking "damages for allegedly unconstitutional conviction or imprisonment... prove that the conviction or sentence has been reversed on direct appeal, expunged by executive order, declared invalid by a state tribunal authorized to make such determination, or called into question by a federal court's issuance of a writ of habeas corpus").

The parties were notified that objections to the Report & Recommendation were due by August 29, 2025. No objections were filed. Upon a review of the record of this matter and the Report and Recommendation, the Court finds no clear error on the face of the record, and therefore enters the following order. AND NOW, this 22nd day of December, 2025, it is hereby ORDERED that the case is DISMISSED WITHOUT PREJUDICE.

The Report & Recommendation is adopted as the opinion of the Court. BY THE COURT: /s/ J. Nicholas Ranjan United States District Judge cc: Brian M. Webb Lawrence County Jail 111 S. Milton Street New Castle, PA 16101