

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
ALABAMA

Jibrail Malik Muhammad, Sr. v. Tyrone Hatcher

Civil Action No. 2:26-00055-JB-B · No. Civil Action No. 2:26-00055-JB-B · Decided June 24, 2026

SUMMARY

The United States District Court for the Southern District of Alabama overruled the plaintiff’s objections under Federal Rule of Civil Procedure 72(a) to a magistrate judge’s order requiring an amended complaint. The court held that the order was neither clearly erroneous nor contrary to law and directed the plaintiff to file an amended complaint within thirty days, warning that failure to comply could result in dismissal.

CASE DETAILS

COURT	United States District Court for the Southern District of Alabama
WRITING FOR THE COURT	Jeffrey U. Beaverstock
JURISDICTION	United States District Court for the Southern District of Alabama
DECIDED	June 24, 2026
DOCKET	Civil Action No. 2:26-00055-JB-B
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff filed a Rule 72(a) objection to a magistrate judge's nondispositive pretrial order requiring him to amend his complaint to correct shotgun pleading defects.
STANDARD OF REVIEW	Under Federal Rule of Civil Procedure 72(a), a district court must modify or set aside a magistrate judge's order on a nondispositive pretrial matter only if the order is clearly erroneous or contrary to law. The standard is extremely deferential; clear error requires an abuse of discretion or a definite and firm conviction that a mistake has been made, while an order is contrary to law if it fails to apply or misapplies relevant statutes, case law, or procedural rules.
PRECEDENTIAL VALUE	unpublished_nonprecedential
PARTIES	Jibrail Malik Muhammad, Sr. v. Tyrone Hatcher

TOPICS

pleadings

civil procedure

motion to amend

PRACTICE AREAS

civil procedure

pleading

QUESTIONS PRESENTED

1. Whether the magistrate judge's order requiring Muhammad to amend his complaint to correct shotgun pleading deficiencies was clearly erroneous or contrary to law under Federal Rule of Civil Procedure 72(a).
2. Whether the district court should overrule Muhammad's objections and affirm the magistrate judge's order.

HOLDINGS

1. A district court will not alter a magistrate judge's nondispositive pretrial order under Rule 72(a) absent clear error or a ruling contrary to law, and Muhammad failed to establish either ground.
2. Muhammad was directed to file an amended complaint complying with the magistrate judge's order within thirty days; failure to do so would result in dismissal for failure to comply with court orders or otherwise pursue the litigation.

KEY QUOTATIONS

“The “clearly erroneous or contrary to law” standard of review is “extremely deferential.””

“Relief is appropriate under the “clearly erroneous” prong of the test only if the district court “finds that the Magistrate Judge abused his discretion or, if after viewing the record as a whole, the Court is left with a definite and firm conviction that a mistake has been made.””

“An order is contrary to law when it fails to apply or misapplies relevant statutes, case law or rules of procedure.”

“If Plaintiff desires to continue with his case, he is DIRECTED to file an amended complaint in compliance with the Magistrate Judge's order (Doc. 3) within thirty (30) days from the date of this Order.”

FACTUAL BACKGROUND

Muhammad's initial pro se complaint recited numerous events spanning decades without a causal connection, attempted to state multiple causes of action in a single count, and failed to connect specific factual allegations to actual claims. The magistrate judge granted him an opportunity to correct those defects by filing an amended complaint before recommending dismissal. Muhammad instead filed extensive objections challenging the magistrate judge's procedural analysis and order.

PROCEDURAL HISTORY

Muhammad commenced the pro se action in February 2026 and was granted leave to proceed without prepayment of fees. The magistrate judge ordered him to file an amended complaint correcting shotgun pleading deficiencies. Muhammad obtained permission to file objections out of time, then filed extensive objections. The district court overruled the objections, affirmed the magistrate judge's order, and directed Muhammad to file a compliant amended complaint within thirty days or face dismissal.

DISPOSITION

affirmed

CASES CITED

- Dochniak v. Dominion Management Services, Inc., 240 F.R.D. 451 (D. Minn. 2006)
- Graham v. Mukasey, 247 F.R.D. 205 (D.D.C. 2008)
- Murphy v. Gardner, 413 F. Supp. 2d 1156 (D. Colo. 2006)
- Dees v. Hyundai Motor Mfg. Alabama, LLC, 524 F. Supp. 2d 1348 (M.D. Ala. 2007)
- Botta v. Barnhart, 475 F. Supp. 2d 174 (E.D.N.Y. 2007)
- S.E.C. v. Cobalt Multifamily Investors I, Inc., 542 F. Supp. 2d 277 (S.D.N.Y. 2008)
- Gaudet & Co. v. ACE Fire Underwriters Insurance Co., 2024 WL 171697 (S.D. Ala. Jan. 16, 2024)
- Pigott v. Sanibel Dev., LLC, 2008 WL 2937804 (S.D. Ala. July 23, 2008)