

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK

Sir-Raven R. Rodgers v. John C. Garcia, Erie County Sheriff

Rodgers v. Garcia · No. 26-CV-570 (JLS) · Decided March 26, 2026

SUMMARY

The United States District Court for the Western District of New York administratively terminated Sir-Raven R. Rodgers’s § 1983 action because he neither paid the filing and administrative fees nor submitted a complete in forma pauperis application. The court permitted Rodgers to reopen the case by April 27, 2026, upon submitting the required inmate-account certification and authorization or paying \$405.00, and deferred mandatory prisoner-action screening until reopening.

CASE DETAILS

COURT	United States District Court for the Western District of New York
JURISDICTION	United States District Court for the Western District of New York
DECIDED	March 26, 2026
DOCKET	26-CV-570 (JLS)
DISPOSITION	other
PROCEDURAL POSTURE	A pro se prisoner filed a 42 U.S.C. § 1983 complaint and an incomplete application to proceed in forma pauperis. The district court administratively terminated the action without filing the complaint or assessing a filing fee, deferred mandatory prisoner screening, and granted leave to reopen upon submission of the required documentation or payment of the fees.
PRECEDENTIAL VALUE	unpublished, nonprecedential district-court order

TOPICS

- civil procedure
- prisoners rights
- section 1983

PRACTICE AREAS

- civil procedure
- prisoner civil rights
- in forma pauperis proceedings

QUESTIONS PRESENTED

1. Whether an incarcerated plaintiff's civil action may proceed when he has neither paid the required filing and administrative fees nor submitted the required certification and authorization for IFP status.
2. Whether mandatory screening under 28 U.S.C. §§ 1915(e)(2) and 1915A must occur before the prisoner properly commences the action.

HOLDINGS

1. A prisoner who does not pay the required filing and administrative fees must satisfy the statutory requirements for proceeding in forma pauperis, including submission of the required inmate trust account certification and signed authorization. Because Rodgers did not satisfy those requirements, the Clerk was directed to administratively terminate the action without filing the complaint or assessing a filing fee.
2. The court may defer mandatory screening under 28 U.S.C. §§ 1915(e)(2) and 1915A until the case is reopened after Rodgers properly submits the required IFP materials or pays the required fees.
3. Administrative termination under the order is not a dismissal for statute-of-limitations purposes; if Rodgers timely reopens the action under the order's conditions, the action is not barred solely because of the administrative termination.

KEY QUOTATIONS

“Therefore, the Clerk of Court shall administratively terminate this action, without filing the complaint or assessing a filing fee”

“Such an administrative termination is not a “dismissal” for statute of limitations purposes.”

FACTUAL BACKGROUND

Rodgers, confined at the Erie County Holding Center, submitted a complaint asserting claims under 42 U.S.C. § 1983. He did not pay the \$350 filing fee or the \$55 administrative fee. His IFP application lacked a certified inmate trust account statement or certification and a signed authorization form.

PROCEDURAL HISTORY

Rodgers initially filed the complaint in the Northern District of New York. On March 25, 2026, that court transferred the case to the Western District of New York because the allegations concerned events at the Erie County Holding Center. After transfer, the Western District found that Rodgers had neither paid the filing and administrative fees nor submitted a complete IFP application.

DISPOSITION

other

CASES CITED

- *Houston v. Lack*, 487 U.S. 266, 270-76 (1988)

- McDowell v. Del. State Police, 88 F.3d 188, 191 (8th Cir. 1996)
- Williams-Guice v. Bd. of Educ. of City of Chicago, 45 F.3d 161, 163 (7th Cir. 1995)

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