

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
GEORGIA, MACON DIVISION

Travis S. Pierce v. Officer Short, et al.

Pierce v. Short · No. 5:25-cv-382-CAR-ALS · Decided February 26, 2026

SUMMARY

The United States District Court for the Middle District of Georgia screens Travis S. Pierce’s pro se 42 U.S.C. § 1983 complaint under the Prison Litigation Reform Act. The court permits Pierce’s excessive-force claims against Officer Short and Officer Meeks to proceed for further factual development, while recommending dismissal without prejudice of claims against unidentified John Doe defendants. The order also addresses service, discovery, disclosure and preservation of video or photographic evidence, and related case-management requirements.

CASE DETAILS

COURT	United States District Court for the Middle District of Georgia, Macon Division
WRITING FOR THE COURT	Alfreda L. Sheppard
JURISDICTION	United States District Court for the Middle District of Georgia, Macon Division
DECIDED	February 26, 2026
DOCKET	5:25-cv-382-CAR-ALS
DISPOSITION	other
PROCEDURAL POSTURE	Prisoner civil-rights action under 42 U.S.C. § 1983 reviewed at the preliminary-screening stage under the Prison Litigation Reform Act. The magistrate judge recommended dismissal without prejudice of the claims against the unidentified John Doe defendants and ordered service on Officers Short and Meeks.
STANDARD OF REVIEW	At PLRA preliminary screening, the court must dismiss a prisoner complaint that is frivolous, malicious, fails to state a claim, or seeks monetary relief from an immune defendant. A complaint must contain sufficient factual matter to state a plausible claim for relief, and pro se allegations are liberally construed.
PRECEDENTIAL VALUE	Unknown; district court order and recommendation with no reporter citation

PARTIES

Travis S. Pierce v. Officer Short, Officer Meeks, John Doe defendants

TOPICS

section 1983

prisoners rights

police misconduct

cruel and unusual punishment

civil procedure

PRACTICE AREAS

civil rights

prisoner civil rights

constitutional law

civil procedure

remedies

QUESTIONS PRESENTED

1. Whether Pierce's allegations plausibly stated Eighth Amendment excessive-force claims against Officers Short and Meeks at the preliminary-screening stage.
2. Whether the claims against unidentified John Doe defendants should be dismissed because Pierce did not describe them sufficiently to permit service of process.
3. Whether Pierce had accumulated enough qualifying dismissals to be barred from proceeding in forma pauperis under 28 U.S.C. § 1915(g).

HOLDINGS

1. The allegations that Officers Short and Meeks threw Pierce to the floor and dragged him with enough force to cause a broken elbow and other injuries were sufficient at the preliminary-review stage to state colorable Eighth Amendment excessive-force claims and permit those claims to proceed for further factual development.
2. The claims against the John Doe defendants were recommended for dismissal without prejudice because Pierce did not provide descriptions sufficiently clear to allow the defendants to be identified and served.
3. The court determined that available court records showed only one qualifying strike under 28 U.S.C. § 1915(g), so Pierce was not barred from proceeding in forma pauperis on the asserted litigation history.

KEY QUOTATIONS

“Therefore, Plaintiff’s excessive force claims against Officer Short of the Jones County Sheriff’s Department and Officer Meeks of the Gray Police Department will be permitted to proceed for further factual development.”

“It is therefore RECOMMENDED that Plaintiff’s claims as to the John Doe defendants be DISMISSED without prejudice.”

FACTUAL BACKGROUND

On June 10, 2025, Officer Short allegedly required Pierce to change from jail-issued clothing into his personal clothing before transportation to another correctional facility. After Pierce refused and officers were summoned, Pierce alleged that officers threw him to the floor and dragged him while handcuffed. He claimed injuries including a broken elbow, a bruised knee, and aggravation of prior back and knee injuries. The complaint identified two additional officers only as John Does without descriptions sufficient for service.

PROCEDURAL HISTORY

Pierce filed a pro se § 1983 complaint and a motion to proceed in forma pauperis. The court granted IFP status, required a recast complaint, and conducted preliminary review under 28 U.S.C. §§ 1915A and 1915(e). The court found colorable excessive-force claims against Officers Short and Meeks, recommended dismissal without prejudice of the claims against the John Doe defendants, and ordered service on Short and Meeks. The recommendation was subject to objections to the district judge.

DISPOSITION

other

CASES CITED

- Carmichael v. United States, 966 F.3d 1250, 1258 (11th Cir. 2020)
- Miller v. Donald, 541 F.3d 1091, 1100 (11th Cir. 2008)
- Daker v. Ward, 999 F.3d 1300, 1308, 1310 (11th Cir. 2021)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555-56, 570 (2007)
- Hale v. Tallapoosa Cnty., 50 F.3d 1579, 1582 (11th Cir. 1995)
- Bingham v. Thomas, 654 F.3d 1171, 1176-77 (11th Cir. 2011)
- Wade v. McDade, 106 F.4th 1251, 1255 (11th Cir. 2024) (en banc)
- Moore v. Hunter, 847 F. App'x 694, 697 (11th Cir. 2021)
- Thomas v. Bryant, 614 F.3d 1288, 1303-04 (11th Cir. 2010)
- Skrtich v. Thornton, 280 F.3d 1295, 1300 (11th Cir. 2002)
- Whitley v. Albers, 475 U.S. 312, 320-21 (1986)
- Pearson v. Callahan, 555 U.S. 223 (2009)
- Campbell v. Sikes, 169 F.3d 1353, 1375 (11th Cir. 1999)
- Williams v. Radford, 64 F.4th 1185, 1195-97 (11th Cir. 2023)
- Richardson v. Johnson, 598 F.3d 734, 738 (11th Cir. 2010)
- Dean v. Barber, 951 F.2d 1210, 1215-16 (11th Cir. 1992)