

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ARIZONA

Jacob Raymond Douglas Shuffler, by and through Next Friend
Gregory Lee Cook v. State of Arizona, et al.

No. CV-25-08238-PCT-JAT (MTM) (D. Ariz. Jan. 12, 2026) · No. No. CV-25-08238-PCT-JAT (MTM) ·
Decided January 12, 2026

SUMMARY

The United States District Court for the District of Arizona denied Gregory Lee Cook’s request to proceed as the next friend of incarcerated plaintiff Jacob Raymond Douglas Shuffler. Because Cook did not establish the requirements for next-friend standing, the court dismissed the § 1983 action without prejudice for lack of jurisdiction and directed the Clerk to provide Shuffler with forms for filing a new action.

CASE DETAILS

COURT	United States District Court for the District of Arizona
WRITING FOR THE COURT	James A. Teilborg
JURISDICTION	United States District Court for the District of Arizona
DECIDED	January 12, 2026
DOCKET	No. CV-25-08238-PCT-JAT (MTM)
DISPOSITION	dismissed
PROCEDURAL POSTURE	A purported next friend filed a pro se 42 U.S.C. § 1983 complaint on behalf of an incarcerated plaintiff. The district court denied next-friend status and dismissed the complaint and action without prejudice for lack of standing and jurisdiction.
PRECEDENTIAL VALUE	Unknown

TOPICS

- standing
- subject matter jurisdiction
- section 1983
- prisoners rights
- civil rights

PRACTICE AREAS

- civil rights
- federal jurisdiction
- prisoner litigation
- civil procedure

QUESTIONS PRESENTED

1. Whether Gregory Lee Cook established Article III standing to prosecute a civil-rights action as the next friend of incarcerated plaintiff Jacob Raymond Douglas Shuffler.
2. Whether the complaint and action should be dismissed without prejudice when the purported next friend failed to establish standing.

HOLDINGS

1. Cook lacked Article III standing to pursue the action on his own behalf because he did not establish an injury in fact fairly traceable to the challenged conduct and redressable by a favorable decision.
2. Cook did not establish the requirements for next-friend standing because he failed to provide an adequate explanation why Shuffler could not appear on his own behalf and did not otherwise show entitlement to next-friend status.
3. The complaint and action were dismissed without prejudice for lack of jurisdiction because Cook lacked standing to proceed as Shuffler's next friend.

KEY QUOTATIONS

“Under Article III of the United States Constitution, a federal court cannot consider the merits of a legal claim unless the person seeking to invoke the jurisdiction of the court establishes the requisite standing to sue.” (at 1)

“To qualify for “next friend” standing, a “next friend” must “provide an adequate explanation—such as inaccessibility, mental incompetence, or other disability—why the real party in interest cannot appear on his own behalf to prosecute the action,” must be “truly dedicated to the best interests of the person on whose behalf he seeks to litigate,” and “must have some significant relationship with the real party in interest.”” (at 2)

“The burden is on the ‘next friend’ clearly to establish the propriety of his status and thereby justify the jurisdiction of the court.” (at 2)

FACTUAL BACKGROUND

Gregory Lee Cook filed a pro se civil-rights complaint under 42 U.S.C. § 1983 on behalf of incarcerated plaintiff Jacob Raymond Douglas Shuffler. Cook proceeded as Shuffler's purported next friend but did not provide an adequate explanation why Shuffler could not appear on his own behalf or otherwise establish entitlement to next-friend status. Cook also had no standing to pursue the action in his own right.

PROCEDURAL HISTORY

On November 7, 2025, Gregory Lee Cook filed the complaint and paid the filing fee as the purported next friend of Jacob Raymond Douglas Shuffler, who was incarcerated in the Mohave County Jail. The district court determined that Cook had not established the requirements for next-friend standing, denied that status, dismissed the complaint and action without prejudice, and directed the Clerk to enter judgment and mail approved forms for filing a new action.

DISPOSITION

dismissed

CASES CITED

- Whitmore v. Arkansas, 495 U.S. 149 (1990)
- Steel Co. v. Citizens for a Better Environment, 523 U.S. 83 (1998)

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