

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
ALABAMA, NORTHERN DIVISION

Roy Phifer v. Jack W. Daniels, et al.

Phifer · No. 2:25-cv-748-RAH · Decided January 5, 2026

SUMMARY

The United States District Court for the Middle District of Alabama overruled Roy Phifer’s objections to magistrate judge recommendations concerning his request to enjoin foreclosure of real property. The court held that res judicata barred relitigation of whether the property was part of Phifer’s bankruptcy estate and concluded that proposed CARES Act claims would be futile. The court denied injunctive relief, granted defendants’ motion to dismiss, denied sanctions, and dismissed the case without prejudice.

CASE DETAILS

COURT	United States District Court for the Middle District of Alabama, Northern Division
WRITING FOR THE COURT	R. Austin Huffaker, Jr.
JURISDICTION	United States District Court for the Middle District of Alabama
DECIDED	January 5, 2026
DOCKET	2:25-cv-748-RAH
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff sought temporary and preliminary injunctive relief to prevent foreclosure and alleged that the property was protected by the automatic stay in his Chapter 13 bankruptcy case. After a magistrate judge recommended denial of injunctive relief, dismissal, and denial of sanctions, the district court conducted de novo review of sufficiently specific objections and adopted the recommendations.
STANDARD OF REVIEW	The district court reviewed disputed portions of the magistrate judge’s recommendations de novo under 28 U.S.C. § 636(b)(1) and Federal Rule of Civil Procedure 72(b)(3). Insufficiently specific objections receive clear-error review.
PRECEDENTIAL VALUE	Unknown; district court order with no reporter or precedential designation stated in the source.

PARTIES

Roy Phifer v. Jack W. Daniels, Charles W. Edmondson

TOPICS

injunctions

motions to dismiss

res judicata

bankruptcy

civil procedure

PRACTICE AREAS

Civil procedure

Bankruptcy

Real estate foreclosure

Remedies

QUESTIONS PRESENTED

1. Whether Phifer was entitled to temporary or preliminary injunctive relief based on the alleged application of the automatic stay to the Endover property.
2. Whether res judicata barred Phifer from relitigating ownership of the Endover property and the application of the automatic stay.
3. Whether the district court should take judicial notice of the CARES Act.
4. Whether Phifer should be granted leave to amend to add unspecified claims under the CARES Act.
5. Whether the defendants were entitled to Rule 11 sanctions.

HOLDINGS

1. Res judicata barred Phifer from relitigating whether the Endover property was part of his bankruptcy estate and subject to the automatic stay.
2. Phifer was not entitled to temporary or preliminary injunctive relief because he was unlikely to succeed on the merits, and res judicata barred his claims.
3. Leave to amend was properly denied because Phifer did not properly request amendment or provide the substance of a proposed amended complaint, and amendment would be futile.

KEY QUOTATIONS

“Res judicata “bars the filing of claims which were raised or could have been raised in an earlier proceeding.””

“A proposed amendment may be denied for futility “when the complaint as amended would still be properly dismissed.””

FACTUAL BACKGROUND

Phifer sued to enjoin Jack W. Daniels and Charles W. Edmondson from foreclosing on real property located at 4200 Endover Drive S. He alleged that the property was part of his Chapter 13 bankruptcy estate and therefore protected by the automatic stay under 11 U.S.C. § 362. In an earlier bankruptcy proceeding, the Bankruptcy Court determined that Phifer's company, RDL Enterprises, Inc., rather than Phifer, owned the property and that the automatic stay did not apply to it.

PROCEDURAL HISTORY

Phifer filed the action on September 19, 2025. Defendants moved to dismiss and for Rule 11 sanctions. The magistrate judge recommended denying injunctive relief, granting dismissal, and denying sanctions. Phifer objected, but the district court overruled the objections, denied injunctive relief, granted the motion to dismiss, denied sanctions, and dismissed the case without prejudice.

DISPOSITION

dismissed

CASES CITED

- Jeffrey S. ex rel. Ernest S. v. State Bd. of Educ., 896 F.2d 507, 513 (11th Cir. 1990)
- United States v. Gopie, 347 F. App'x 495, 499 n.1 (11th Cir. 2009)
- Macort v. Prem, Inc., 208 F. App'x 781, 783-85 (11th Cir. 2006)
- Ragsdale v. Rubbermaid, Inc., 193 F.3d 1235, 1238 (11th Cir. 1999)
- Maldonado v. U.S. Att'y Gen., 664 F.3d 1369, 1375, 1377 (11th Cir. 2011)
- Ritzen Grp., Inc. v. Jackson Masonry, LLC, 589 U.S. 35, 47 (2020)
- Fleming v. Universal-Rundle Corp., 142 F.3d 1354, 1356 (11th Cir. 1998)
- Manning v. City of Auburn, 953 F.2d 1355, 1358-59 (11th Cir. 1992)
- In re Harris, 3 F.4th 1339, 1344 (11th Cir. 2021)
- Cita Tr. Co. AG v. Fifth Third Bank, 879 F.3d 1151, 1157 (11th Cir. 2018)
- Long v. Satz, 181 F.3d 1275, 1279 (11th Cir. 1999)
- Newton v. Duke Energy Fla., LLC, 895 F.3d 1270, 1277 (11th Cir. 2018)
- Coventry First, LLC v. McCarty, 605 F.3d 865, 870 (11th Cir. 2010)
- Cockrell v. Sparks, 510 F.3d 1307, 1310 (11th Cir. 2007)
- In re Gilbert, 652 B.R. 817, 821 n.3 (Bankr. M.D. Fla. 2023)
- Wolf v. Cigna Health & Life Ins. Co., 733 F. Supp. 3d 1278, 1282 (S.D. Fla. 2024)
- Saloojas, Inc. v. Aetna Health of Ca., Inc., 80 F.4th 1011, 1016 (9th Cir. 2023)
- Carr v. Kabbage, Inc., No. 1:22-cv-1249-VMC, 2023 WL 3150084, at *4 (N.D. Ga. Mar. 31, 2023)
- Murphy Med. Assocs., LLC v. Centene Corp., No. 22-CV-504-VLB, 2023 WL 2384143, at *6 (D. Conn. Mar. 6, 2023)
- Arsensis v. Blue Foundry Bancorp, No. 24-08978, 2025 WL 383750, at *10 (D.N.J. Feb. 4, 2025)

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