

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

Ray Quantrevius Raheem v. Sheriff Billy Hancock, et al.

Raheem v. Hancock · No. 1:25-cv-178-LAG-ALS · Decided March 9, 2026

SUMMARY

The court grants Ray Quantrevius Raheem leave to proceed in forma pauperis but denies his motions to compel discovery and appoint counsel. It orders him to recast his 42 U.S.C. § 1983 complaint to include only claims related to his detention at Crisp County Detention Center and recommends dismissal without prejudice of the improperly joined claims arising from other facilities. The order also addresses prisoner filing-fee obligations under the Prison Litigation Reform Act and provides a fourteen-day objection period.

CASE DETAILS

COURT	United States District Court for the Middle District of Georgia, Albany Division
WRITING FOR THE COURT	Alfreda L. Sheppard
JURISDICTION	United States District Court for the Middle District of Georgia, Albany Division
DECIDED	March 9, 2026
DOCKET	1:25-cv-178-LAG-ALS
DISPOSITION	other
PROCEDURAL POSTURE	A prisoner proceeding pro se filed a 42 U.S.C. § 1983 complaint, moved to proceed in forma pauperis, moved to compel discovery, and moved twice for appointment of counsel. The magistrate judge granted in forma pauperis status, denied discovery and appointment of counsel, ordered the complaint recast to address only claims related to the Crisp County Detention Center, and recommended dismissal without prejudice of the remaining claims for improper joinder.
STANDARD OF REVIEW	At preliminary screening under 28 U.S.C. §§ 1915A and 1915(e), the court must dismiss claims that are frivolous, malicious, fail to state a claim, or seek monetary relief from an immune defendant. Pro se filings are liberally construed, but the complaint must contain sufficient factual matter to state a plausible claim. Joinder under Federal Rule of Civil Procedure 20(a)(2) requires claims against

	defendants to arise from the same transaction, occurrence, or series of transactions or occurrences and to involve a common question of law or fact.
PRECEDENTIAL VALUE	unpublished
PARTIES	Ray Quantrevous Raheem v. Sheriff Billy Hancock, et al.

TOPICS

joinder pleadings civil procedure prisoners rights section 1983

PRACTICE AREAS

civil procedure prisoner civil rights in forma pauperis procedure pleading and joinder

QUESTIONS PRESENTED

1. Whether the claims arising from three separate correctional facilities and involving different defendants were properly joined under Federal Rule of Civil Procedure 20.
2. Whether improperly joined claims should be dismissed, severed, or otherwise managed when dismissal could impair the plaintiff's ability to refile claims before the statute of limitations expires.
3. Whether the plaintiff's motions to compel discovery were premature before screening and service.
4. Whether appointment of counsel was warranted in this pro se prisoner civil-rights action.
5. Whether the plaintiff qualified to proceed in forma pauperis and was exempt from paying an initial partial filing fee because he lacked assets.

HOLDINGS

1. A prisoner who demonstrates inability to pay may proceed in forma pauperis, and the court may permit filing without payment of an initial partial filing fee when the prisoner lacks assets and means to pay it, while requiring payment of the full filing fee through statutory installments.
2. Appointment of counsel is not a constitutional right in an ordinary civil case and is warranted only in exceptional circumstances committed to the district court's discretion.
3. A court must screen a prisoner complaint seeking relief from a governmental entity, official, or employee, and must dismiss claims that are frivolous, malicious, fail to state a plausible claim, or seek monetary relief from an immune defendant.
4. To state a claim under § 1983, a plaintiff must allege that an act or omission deprived him of a constitutional or federal statutory right and that the act or omission was committed by a person acting under color of state law.
5. A plaintiff may join defendants in one action only when the claims arise from the same transaction, occurrence, or series of transactions or occurrences and involve a common question of law or fact;

claims arising from unrelated incarceration periods at separate facilities and involving different defendants are improperly joined.

6. A motion to compel discovery is premature when the complaint has not completed preliminary screening and no service of process has occurred.

KEY QUOTATIONS

“The Federal Rules of Civil Procedure permit a plaintiff to join only related claims and defendants in a single complaint.” (PRELIMINARY SCREENING, III. Plaintiff's Claims)

“The Court cannot dismiss the entire Complaint for improper joinder.” (PRELIMINARY SCREENING, III. Plaintiff's Claims)

“There shall be no service of process in this case until further order of the Court.” (CONCLUSION)

FACTUAL BACKGROUND

Raheem alleged constitutional violations at three separate facilities. At the Crisp County Detention Center, he alleged that an officer dragged him by his handcuffs, that he was housed in a cell contaminated with fecal matter, that he was transferred after complaining about conditions, and that staff failed to respond adequately to a suicide warning. He also alleged hurricane-related conditions at the Patten Probation Detention Center and extreme conditions, including lack of electricity, plumbing, windows, and adequate heat, at Jackson State Prison. The complaint sought primarily monetary damages under 42 U.S.C. § 1983.

PROCEDURAL HISTORY

Raheem filed a prisoner civil-rights complaint concerning alleged events at the Crisp County Detention Center, Jackson State Prison, and Robert L. Patten Probation Detention Center. The court granted leave to proceed in forma pauperis and directed collection of the filing fee under the Prison Litigation Reform Act. After preliminary review, the magistrate judge concluded that the claims arising from the three facilities were improperly joined, preserved the Crisp County Detention Center claims because limitations concerns could affect refiling, ordered a recast complaint limited to those claims, denied premature discovery and appointed counsel, and recommended dismissal without prejudice of the remaining claims. The parties were given fourteen days to object to the recommendation.

DISPOSITION

other

CASES CITED

- Fowler v. Jones, 899 F.2d 1088, 1096 (11th Cir. 1990)
- Smith v. Fla. Dep't of Corr., 713 F.3d 1059, 1063 (11th Cir. 2013)
- Steele v. Shah, 87 F.3d 1266, 1271 (11th Cir. 1996)
- DeJesus v. Lewis, 14 F.4th 1182, 1204-05 (11th Cir. 2021)

- *Ulmer v. Chancellor*, 691 F.2d 209, 213 (5th Cir. 1982)
- *Bass v. Perrin*, 170 F.3d 1312, 1320 (11th Cir. 1999)
- *Mallard v. U.S. Dist. Ct. for S. Dist. of Iowa*, 490 U.S. 296, 310 (1989)
- *Taylor v. Pekerol*, 760 F. App'x 647, 651 (11th Cir. 2019)
- *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)
- *Smith v. Trans-Siberian Orchestra*, 728 F. Supp. 2d 1315, 1319 (M.D. Fla. 2010)
- *Republic Health Corp. v. Lifemark Hosp. Corp. of Fla.*, 755 F.2d 1453, 1455 (11th Cir. 1985)
- *Hagan v. Rogers*, 570 F.3d 146, 157 (3d Cir. 2009)
- *Skillern v. Ga. Dep't of Corr. Comm'r*, 379 F. App'x 859, 860 (11th Cir. 2010)
- *State Distribs., Inc. v. Glenmore Distilleries Co.*, 738 F.2d 405, 416-17 (10th Cir. 1984)
- *DirecTV, Inc. v. Leto*, 467 F.3d 842, 845-46 (3d Cir. 2006)
- *Daker v. Head*, 730 F. App'x 765, 768 (11th Cir. 2018)