

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
OHIO, EASTERN DIVISION

Haneef Muhammad v. Gap Inc., et al.

Muhammad · No. 2:24-cv-3676 · Decided December 10, 2025

SUMMARY

The United States District Court for the Southern District of Ohio dismisses Haneef Muhammad’s action without prejudice based on repeated failures to appear at court-ordered proceedings and other contumacious litigation conduct. The court imposes monetary sanctions totaling \$1,500, denies Muhammad’s renewed motion for recusal, and designates him a vexatious litigant. The order establishes attorney-certification and court-permission requirements for certain future filings by Muhammad.

CASE DETAILS

COURT	United States District Court for the Southern District of Ohio, Eastern Division
WRITING FOR THE COURT	Douglas R. Cole
JURISDICTION	United States District Court for the Southern District of Ohio, Eastern Division
DECIDED	December 10, 2025
DOCKET	2:24-cv-3676
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court addressed the plaintiff’s repeated failures to appear at court-ordered proceedings, filing of numerous frivolous motions, and use of fabricated or AI-hallucinated case citations. The court denied a renewed motion for recusal, dismissed the action without prejudice as a terminating sanction, imposed monetary sanctions, and entered a narrowly tailored vexatious-litigant filing restriction.
STANDARD OF REVIEW	Abuse of discretion for the imposition of terminating sanctions and monetary sanctions under the court’s inherent authority; the opinion applied the Sixth Circuit’s four-factor framework for dismissal and four-part framework for vexatious-litigant filing restrictions.
PRECEDENTIAL VALUE	Unpublished federal district court opinion; precedential status unknown

PARTIES

Haneef Muhammad v. Gap Inc., Seth Vogelstein, Verisk Analytics, The Hartford, Other defendants

TOPICS

sanctions attorney fees costs injunctions civil procedure

PRACTICE AREAS

Civil procedure Federal courts Sanctions Attorney fees and costs

QUESTIONS PRESENTED

1. Whether Muhammad's repeated failure to appear and other contumacious litigation conduct warranted dismissal under the district court's inherent authority.
2. Whether monetary sanctions were appropriate to compensate defendants for attorney time incurred when Muhammad failed to attend court-ordered proceedings.
3. Whether Muhammad should be designated a vexatious litigant and subjected to narrowly tailored prefiling restrictions.
4. Whether the district judge should recuse based on alleged bias, personal participation in the proceedings, or status as a material witness.

HOLDINGS

1. A district court may dismiss an action under its inherent authority when a party engages in bad-faith, willful, or contumacious conduct, and Muhammad's repeated refusal to attend court-ordered proceedings, combined with his other litigation misconduct, warranted dismissal without prejudice.
2. The court could impose monetary sanctions under its inherent authority to compensate defendants for reasonable attorney time and expense caused by Muhammad's bad-faith failure to attend court-ordered proceedings.
3. A district court may impose a prefiling restriction on a prolific and vexatious litigant when the litigant receives notice, the court creates an adequate record, makes substantive findings of frivolous or harassing conduct, and narrowly tailors the restriction to the specific misconduct. Those requirements were satisfied here.
4. Recusal was not required because the judge's presiding over the case did not make the judge a material witness, and the plaintiff identified no extrajudicial information or objective basis for bias.

KEY QUOTATIONS

"A district court has the inherent power to sanction a party when that party exhibits bad faith." (Opinion at 2)

"a case is properly dismissed by the district court where there is a clear record of delay or contumacious conduct." (Opinion at 4)

“Litigation cannot proceed if a party repeatedly refuses to appear in person or telephonically when summoned.” (Opinion at 8)

“A district court “has inherent authority to issue an injunctive order to prevent prolific litigants from filing harassing and vexatious pleadings.”” (Opinion at 11)

FACTUAL BACKGROUND

Muhammad repeatedly failed to attend court-ordered proceedings, including hearings concerning emergency relief and alleged fabricated citations in his filings. Despite repeated warnings, he continued filing numerous motions and related filings, many of which the court viewed as frivolous, harassing, or supported by inaccurate citations. Defendants incurred attorney time and expense appearing at hearings that Muhammad did not attend. The court also found that Muhammad's filing volume and refusal to participate in proceedings taxed judicial resources and obstructed the litigation process.

PROCEDURAL HISTORY

Muhammad filed numerous motions and repeatedly failed to appear at proceedings, including a June 18, 2025 telephonic status conference, a July 16, 2025 show-cause hearing, and a November 19, 2025 telephonic status conference. The court repeatedly warned him that nonappearance and litigation misconduct could result in dismissal, monetary sanctions, contempt, and vexatious-litigant restrictions. A prior appeal was dismissed by the Sixth Circuit for lack of jurisdiction, after which the district court resumed proceedings. The court issued an amended opinion solely to correct its prior dismissal of the action with prejudice; the amended disposition dismissed without prejudice subject to filing restrictions.

DISPOSITION

dismissed

CASES CITED

- Bradley J. Delp Revocable Tr. Dated January 8, 1992 v. MSJMR 2008 Irrevocable Tr. Dated December 31, 2008, 665 F. App'x 514 (6th Cir. 2016)
- Chambers v. NASCO, Inc., 501 U.S. 32 (1991)
- Jamar-Mamon X v. University of Cincinnati, 758 F. Supp. 3d 756 (S.D. Ohio 2024)
- Knoll v. American Telephone & Telegraph Co., 176 F.3d 359 (6th Cir. 1999)
- Schafer v. City of Defiance Police Department, 529 F.3d 731 (6th Cir. 2008)
- Carpenter v. City of Flint, 723 F.3d 700 (6th Cir. 2013)
- Harmon v. CSX Transportation, Inc., 110 F.3d 364 (6th Cir. 1997)
- Dell, Inc. v. Elles, No. 07-2082, 2008 WL 4613978 (6th Cir. June 10, 2008)
- Clemons v. DeWine, No. 19-3033, 2019 WL 7567197 (6th Cir. May 1, 2019)
- Feathers v. Chevron U.S.A., Inc., 141 F.3d 264 (6th Cir. 1998)
- Filipas v. Lemons, 835 F.2d 1145 (6th Cir. 1987)

- De Long v. Hennessey, 912 F.2d 1144 (9th Cir. 1990)
- Qiu v. Scott County, Kentucky Board of Education, No. 23-5842, 2024 WL 4257198 (6th Cir. Apr. 8, 2024)
- Andrews v. Heaton, 483 F.3d 1070 (10th Cir. 2007)
- Hobbs v. Ohio Adult Parole Authority, No. 1:13-cv-928, 2024 U.S. Dist. LEXIS 137298 (S.D. Ohio Aug. 1, 2024)

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