

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OHIO, WESTERN DIVISION

Andrew Lee Eugene Knox v. Hardin County Municipal Court, et al.

Case No. 3:25 CV 1174 (N.D. Ohio 2026) (N.D. Ohio 2026) · No. 3:25 CV 1174 · Decided January 12, 2026

SUMMARY

The United States District Court for the Northern District of Ohio dismissed a pro se plaintiff’s claims under Title II of the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, and 42 U.S.C. § 1983. The court held that the plaintiff was not denied meaningful access to the municipal court because substantive proceedings were continued until an ASL interpreter was available and he was otherwise able to communicate. The court denied the plaintiff’s default motions and motion for leave to file a second amended complaint, and dismissed the action under Federal Rule of Civil Procedure 12(b)(6).

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Western Division
WRITING FOR THE COURT	James R. Knepp II
JURISDICTION	United States District Court for the Northern District of Ohio, Western Division
DECIDED	January 12, 2026
DOCKET	3:25 CV 1174
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff moved for entry of default, default judgment, and leave to file a second amended complaint. Defendants moved to dismiss under Federal Rule of Civil Procedure 12(b)(6). The district court denied the default motions and motion for leave to amend, granted the motions to dismiss, and dismissed the action.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded allegations as true and views them in the light most favorable to the plaintiff, but requires factual matter sufficient to state a claim that is plausible on its face. A motion for leave to amend may be denied when the proposed amendment would be futile because it would not withstand a motion to dismiss.

PRECEDENTIAL VALUE	unpublished district court memorandum opinion
PARTIES	Andrew Lee Eugene Knox v. Hardin County Municipal Court, Judge Gregory A. Grimslid, Court Clerk Emily Kissling

TOPICS

[motions to dismiss](#)
[motion to amend](#)
[default judgment](#)
[ada / disability](#)
[due process](#)

PRACTICE AREAS

[civil procedure](#)
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QUESTIONS PRESENTED

1. Whether Knox stated plausible claims under Title II of the ADA and Section 504 of the Rehabilitation Act based on the court's initial failure to provide an ASL interpreter and its accommodation-request procedures.
2. Whether Knox stated a Fourteenth Amendment access-to-the-courts claim under 42 U.S.C. § 1983.
3. Whether the defendants were entitled to dismissal under Rule 12(b)(6).
4. Whether Knox's motion for entry of default and default judgment should be granted.
5. Whether leave to file a second amended complaint should be denied as futile.

HOLDINGS

1. The complaint failed to state plausible claims under Title II of the ADA and Section 504 of the Rehabilitation Act because it did not plausibly allege that Knox was denied effective communication, meaningful access, or the benefits of the Municipal Court's services because of his disability.
2. The complaint failed to state a Fourteenth Amendment access-to-the-courts claim because Knox was not excluded from a proceeding or denied effective access to the courts.
3. Default and default judgment were unwarranted because defendants responded to plaintiff's pleadings in accordance with the Federal Rules of Civil Procedure and court orders granting extensions.
4. Leave to file a second amended complaint was denied as futile because the proposed amendment did not materially alter the allegations or cure the failure to state a plausible federal claim.

KEY QUOTATIONS

“The ADA and its regulations do not give a deaf individual an absolute right to an interpreter.”

“What is required by the ADA . . . is an alternative which allows disabled persons to communicate as effectively as a non-disabled person.”

“In this context, a public entity’s only obligation under the ADA is to provide an accommodation that is “reasonable under the circumstances” and that provides for “a means of communication that [is] as effective as that provided to non-disabled persons.””

FACTUAL BACKGROUND

Knox, who is deaf, received a traffic citation in Hardin County Municipal Court and requested an American Sign Language interpreter before his initial hearing. Court staff required accommodation requests to be made in person and did not provide an official interpreter at the initial hearing, although the hearing was continued so an interpreter could be provided. At the rescheduled hearing, an interpreter was provided for the substantive proceedings, Knox waived a defense, and he was assessed a \$45 fine. Knox alleged that the court's accommodation procedures and staff's treatment violated the ADA, the Rehabilitation Act, and his Fourteenth Amendment right of access to the courts.

PROCEDURAL HISTORY

Knox filed an action alleging violations of Title II of the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, and the Fourteenth Amendment right of access to the courts under 42 U.S.C. § 1983. He filed an amended complaint naming the Hardin County Municipal Court, Judge Gregory A. Grimsliid, and Clerk Emily Kissling as official-capacity defendants. After defendants responded to the pleadings and obtained extensions of time, Knox sought default and default judgment; defendants moved to dismiss. The court dismissed the action for failure to state a plausible federal claim and denied leave to file a second amended complaint as futile.

DISPOSITION

dismissed

CASES CITED

- Hishon v. King & Spalding, 467 U.S. 69, 73 (1984)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555, 570 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Lynch v. Leis, 382 F.3d 642, 648 n.5 (6th Cir. 2004)
- Fritz v. Michigan, 747 F. App'x 402, 404 (6th Cir. 2018)
- Tucker v. Tennessee, 539 F.3d 526, 537, 539, 541 (6th Cir. 2008)
- Anderson v. City of Blue Ash, 798 F.3d 338 (6th Cir. 2015)
- Shaffer v. City of Columbus, 444 F. Supp. 3d 872, 883 (S.D. Ohio 2020)
- Center v. City of West Carrollton, 227 F. Supp. 2d 863, 870 (S.D. Ohio 2002)
- Doe v. Michigan State Univ., 989 F.3d 418, 427 (6th Cir. 2021)
- Rose v. Hartford Underwriters Ins. Co., 203 F.3d 417, 420 (6th Cir. 2000)