

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
PENNSYLVANIA

Isaiah Best, et al. v. SCI-Phoenix, et al.

Best v. SCI-Phoenix · No. 25-CV-6957 · Decided March 2, 2026

SUMMARY

The United States District Court for the Eastern District of Pennsylvania grants Isaiah Best leave to proceed in forma pauperis and directs payment of the filing fee in installments. The order dismisses Michael James Mark Sinclair as a plaintiff and dismisses several claims and defendants without prejudice, while allowing Best 30 days to amend his complaint or notify the court that he will stand on the original complaint.

CASE DETAILS

COURT	United States District Court for the Eastern District of Pennsylvania
WRITING FOR THE COURT	Gerald J. Pappert
JURISDICTION	United States District Court for the Eastern District of Pennsylvania
DECIDED	March 2, 2026
DOCKET	25-CV-6957
DISPOSITION	other
PROCEDURAL POSTURE	The court ruled on a prisoner-plaintiff's motion to proceed in forma pauperis and screened the complaint, dismissing certain claims and parties without prejudice while allowing Isaiah Best an opportunity to amend.
STANDARD OF REVIEW	The order screened the pro se prisoner complaint and dismissed claims under the applicable pleading and jurisdictional standards; the source does not state a separately labeled standard of review.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Isaiah Best, et al. v. SCI-Phoenix, et al.

TOPICS

pleadings

subject matter jurisdiction

section 1983

prisoners rights

civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Best should be permitted to proceed in forma pauperis and pay the filing fee through installments.
2. Whether Sinclair should remain a named plaintiff after failing to comply with the court's order concerning the filing fee and prisoner-account statement.
3. Whether Best's federal claims for monetary damages against the Commonwealth of Pennsylvania, the Pennsylvania Department of Corrections, SCI Phoenix, and the United States should be dismissed.
4. Whether Best's federal claims against Superintendent Joseph Terra should be dismissed.
5. Whether Best's state-law negligence claims should be dismissed for lack of subject matter jurisdiction.
6. Whether Best should be afforded leave to amend or an opportunity to stand on the original complaint.

HOLDINGS

1. Best was granted leave to proceed in forma pauperis, but he remains responsible for paying the full \$350 filing fee in installments under 28 U.S.C. § 1915(b), regardless of the outcome of the case.
2. Michael James Mark Sinclair was dismissed without prejudice as a named plaintiff because he failed to pay the fees or file a compliant in forma pauperis motion with a certified six-month prisoner-account statement after being given thirty days and warned of dismissal.
3. Best's federal claims seeking monetary damages against the Commonwealth of Pennsylvania, the Pennsylvania Department of Corrections, SCI Phoenix, and the United States were dismissed without prejudice and without leave to amend.
4. Best's federal claims against Superintendent Joseph Terra were dismissed without prejudice.
5. Best's state-law negligence claims were dismissed without prejudice for lack of subject matter jurisdiction.
6. Best was permitted to file a complete amended complaint within thirty days or file a notice stating that he would stand on the original complaint; failure to respond would be treated as an intent to stand on the complaint and would lead to a final dismissal order.
7. The six-factor test announced in *Poulis* is not applicable to a dismissal based on a plaintiff's decision to stand on the complaint or abandonment that leaves the case without an operative pleading.

KEY QUOTATIONS

“Best’s state law claims of negligence are DISMISSED WITHOUT PREJUDICE for lack of subject matter jurisdiction.” (Order ¶ 7)

“The amended complaint shall be a complete document that does not rely on the initial Complaint or other papers filed in this case to state a claim.” (Order ¶ 9)

FACTUAL BACKGROUND

Isaiah Best, an incarcerated plaintiff at SCI Phoenix, filed a pro se civil-rights complaint seeking relief against Pennsylvania entities, SCI Phoenix, the United States, and Superintendent Joseph Terra, including federal monetary-damages claims and state-law negligence claims. Michael James Mark Sinclair was also named as a plaintiff but failed to pay the filing fee or submit a motion to proceed in forma pauperis with the required six-month prisoner-account statement. The court dismissed specified claims and parties without prejudice and permitted Best to amend.

PROCEDURAL HISTORY

Isaiah Best filed a pro se prisoner civil-rights complaint and moved to proceed in forma pauperis. The court granted in forma pauperis status, directed payment of the filing fee in installments, deemed the complaint filed, dismissed Michael James Mark Sinclair as a plaintiff for failure to comply with the court's filing-fee and account-statement order, and dismissed specified claims and defendants without prejudice. Best was given thirty days to file an amended complaint or notify the court that he would stand on the original complaint; failure to respond would result in a final dismissal order.

DISPOSITION

other

CASES CITED

- Weber v. McGrogan, 939 F.3d 232, 241 (3d Cir. 2019)
- Borelli v. City of Reading, 532 F.2d 950, 951 n.1 (3d Cir. 1976)
- In re Westinghouse Sec. Litig., 90 F.3d 696, 703-04 (3d Cir. 1996)
- Weber v. McGrogan, 939 F.3d 232, 239-40 (3d Cir. 2019)
- Poulis v. State Farm Fire & Casualty Co., 747 F.2d 863 (3d Cir. 1984)
- Weber v. McGrogan, 939 F.3d 232, 241 & n.11 (3d Cir. 2019)
- Elansari v. Altria, 799 F. App'x 107, 108 n.1 (3d Cir. 2020) (per curiam)
- Dickens v. Danberg, 700 F. App'x 116, 118 (3d Cir. 2017) (per curiam)
- Baker v. Accounts Receivables Mgmt., Inc., 292 F.R.D. 171, 175 (D.N.J. 2013)

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