

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
VIRGINIA, RICHMOND DIVISION

Christopher Lumpkin v. Daugherty

Lumpkin · No. 3:23-cv-80-HEH · Decided April 9, 2026

SUMMARY

The United States District Court for the Eastern District of Virginia denied as moot Christopher Lumpkin’s Rule 59(e) motion concerning a prior default judgment in his 42 U.S.C. § 1983 action against Defendant Daugherty. The court also denied Lumpkin’s request to garnish the defendant, after Lumpkin confirmed that he was satisfied with the \$3,000 damages award.

CASE DETAILS

COURT	United States District Court for the Eastern District of Virginia, Richmond Division
WRITING FOR THE COURT	Henry E. Hudson
JURISDICTION	United States District Court for the Eastern District of Virginia, Richmond Division
DECIDED	April 9, 2026
DOCKET	3:23-cv-80-HEH
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved under Federal Rule of Civil Procedure 59(e) to avoid dismissal and obtain an opportunity to object to the Magistrate Judge's Report and Recommendation after the court entered default judgment awarding him \$3,000. The court construed the filing as a Rule 59(e) motion, denied it as moot, and denied plaintiff's separate request for garnishment.
STANDARD OF REVIEW	A filing received within the Rule 59(e) timeframe is construed as a Rule 59(e) motion. The court denied the motion as moot after determining that plaintiff no longer sought reconsideration.
PRECEDENTIAL VALUE	Unpublished federal district court memorandum opinion; precedential status is unknown.
PARTIES	Christopher Lumpkin v. Daugherty

TOPICS

motion for reconsideration

default judgment

section 1983

damages

civil procedure

PRACTICE AREAS

civil procedure

civil rights

remedies

QUESTIONS PRESENTED

1. Whether Lumpkin's filing received within twenty-eight days of the judgment should be construed as a motion under Federal Rule of Civil Procedure 59(e).
2. Whether the Rule 59(e) motion should be denied as moot after Lumpkin stated that he was satisfied with the \$3,000 judgment.
3. Whether the court could grant Lumpkin's request to place a garnishment on Defendant Daugherty without an identified procedural vehicle authorizing that relief.

HOLDINGS

1. A filing received within the requisite Rule 59(e) period is properly construed as a Rule 59(e) motion.
2. The Rule 59(e) motion was denied as moot because Lumpkin stated that he was satisfied with the \$3,000 damages award and no longer sought reconsideration of the judgment.
3. The court denied Lumpkin's request to place a garnishment on Daugherty because Lumpkin did not identify a procedural vehicle authorizing the requested relief.

KEY QUOTATIONS

“Accordingly, the Rule 59(e) Motion (ECF No. 82) will be denied as moot.” (Conclusion)

“Lumpkin fails to identify a procedural vehicle that would authorize the Court to order the action he seeks.” (Conclusion)

FACTUAL BACKGROUND

Christopher Lumpkin, a Virginia inmate proceeding pro se, alleged under 42 U.S.C. § 1983 that former corrections officer Daugherty violated his Eighth Amendment rights by subjecting him to cruel and unusual punishment. After Daugherty defaulted, the Magistrate Judge held an evidentiary hearing and recommended \$3,000 in damages, consisting of \$2,000 in compensatory damages and \$1,000 in punitive damages. The district court adopted that recommendation and entered judgment. Lumpkin later stated that he was satisfied with the award, while also asking the court to impose a garnishment against Daugherty.

PROCEDURAL HISTORY

The Clerk entered default against Defendant Daugherty. Following an evidentiary hearing, the Magistrate Judge recommended awarding Lumpkin \$3,000 in damages, and the district court adopted the recommendation, entered default judgment, and dismissed the action on December 22, 2025. Lumpkin subsequently filed a submission construed as a Rule 59(e) motion, but after clarification stated that he was satisfied with the \$3,000

award. The court therefore denied the Rule 59(e) motion as moot and denied his request to place a garnishment on Daugherty.

DISPOSITION

other

CASES CITED

- MLC Auto., LLC v. Town of S. Pines, 532 F.3d 269, 277-78 (4th Cir. 2008)
- Dove v. CODESCO, 569 F.2d 807, 809 (4th Cir. 1978)
- Houston v. Lack, 487 U.S. 266, 276 (1988)

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