

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MISSOURI, EASTERN DIVISION

Gebar Byrd v. Shanon Eaton

No. 4:25-cv-01615-CMS, United States District Court for the Eastern District of Missouri, Eastern Division
(February 19, 2026)

SUMMARY

The United States District Court for the Eastern District of Missouri grants Gebar Byrd leave to proceed in forma pauperis and assesses an initial partial filing fee of \$27.10. The court dismisses his 42 U.S.C. § 1983 complaint without prejudice as frivolous and time-barred, holding that his requests to vacate his conviction and obtain release must be pursued through habeas corpus. The court also denies his motion for appointment of counsel as moot and certifies that an appeal would not be taken in good faith.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Eastern Division
WRITING FOR THE COURT	Cristian M. Stevens
JURISDICTION	United States District Court for the Eastern District of Missouri, Eastern Division
DECIDED	February 19, 2026
DOCKET	4:25-cv-01615-CMS
DISPOSITION	dismissed
PROCEDURAL POSTURE	A self-represented state prisoner brought a 42 U.S.C. § 1983 action challenging a 2010 arrest and seeking release from confinement, vacatur of his state-court judgment, and damages. The district court granted leave to proceed in forma pauperis, conducted screening under 28 U.S.C. § 1915(e)(2)(B), and dismissed the complaint without prejudice.
STANDARD OF REVIEW	On screening an in forma pauperis complaint, the court accepts well-pleaded facts as true, liberally construes a self-represented plaintiff's allegations, and determines whether the complaint is frivolous, malicious, fails to state a claim, or seeks relief from an immune defendant under 28 U.S.C. § 1915(e)(2).

TOPICS

statute of limitations

section 1983

federal habeas corpus

post-conviction relief

civil procedure

PRACTICE AREAS

civil rights

prisoner litigation

habeas corpus

civil procedure

QUESTIONS PRESENTED

1. Whether Plaintiff's § 1983 claims based on his 2010 arrest were barred by Missouri's five-year statute of limitations.
2. Whether Plaintiff could obtain vacatur of his state conviction and release from confinement through a § 1983 action.
3. Whether the complaint should be screened and dismissed under 28 U.S.C. § 1915(e)(2)(B) for frivolity and failure to state a claim.
4. Whether Plaintiff was entitled to appointment of counsel after dismissal of the action.

HOLDINGS

1. The § 1983 claims were time-barred because § 1983 claims are subject to Missouri's five-year statute of limitations for personal-injury claims, and Plaintiff filed the action more than five years after the alleged arrest.
2. Plaintiff could not use § 1983 to obtain release from confinement or vacatur of his state-court judgment; those challenges must be brought through habeas corpus.
3. The complaint was subject to dismissal under 28 U.S.C. § 1915(e)(2)(B) because it was legally frivolous and failed to state a claim upon which relief could be granted.

KEY QUOTATIONS

"Release from confinement cannot be sought through a 42 U.S.C. § 1983 action."

"A "claim has facial plausibility when the plaintiff pleads factual content that allows the court to draw the reasonable inference that the defendant is liable for the misconduct alleged.""

FACTUAL BACKGROUND

Plaintiff alleged that Defendant Shanon Eaton unlawfully arrested him on May 26, 2010, based on a purported warrant from Kaskaskia County, Illinois, without reading him his rights or explaining the reason for the arrest. He further alleged that he had been unlawfully detained since the arrest and described himself as a prisoner of war. Plaintiff was serving a state sentence of life plus a consecutive twenty-one years after convictions in the Circuit Court of the City of St. Louis, and his state and federal post-conviction efforts had been unsuccessful.

PROCEDURAL HISTORY

Plaintiff filed a § 1983 complaint against a University City, Missouri, police officer and moved to proceed in forma pauperis and for appointment of counsel. The court granted in forma pauperis status, assessed an initial partial filing fee of \$27.10, screened the complaint, and dismissed it as frivolous and for failure to state a claim. The court also denied appointment of counsel as moot and certified that an appeal would not be taken in good faith.

DISPOSITION

dismissed

CASES CITED

- White v. Clark, 750 F.2d 721, 722 (8th Cir. 1984)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Haines v. Kerner, 404 U.S. 519, 520 (1972)
- Solomon v. Petray, 795 F.3d 777, 787 (8th Cir. 2015)
- Martin v. Aubuchon, 623 F.2d 1282, 1286 (8th Cir. 1980)
- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)
- Buford v. Tremayne, 747 F.2d 445, 447 (8th Cir. 1984)
- Johnson v. Railway Express Agency, 421 U.S. 454, 462 (1975)
- Foster v. Armontrout, 729 F.2d 583, 584 (8th Cir. 1984)
- Sulik v. Taney County, Missouri, 393 F.3d 765, 766-67 (8th Cir. 2005)
- Myers v. Vogal, 960 F.2d 750, 751 (8th Cir. 1992)
- Heck v. Humphrey, 512 U.S. 477, 486-87 (1994)
- Preiser v. Rodriguez, 411 U.S. 475, 500 (1973)
- Byrd v. Buckner, No. 4:18-cv-1760-RHH (E.D. Mo. Sept. 27, 2023)