

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF CONNECTICUT

Ian Wright v. Angel Quiros, et al.

Wright v. Quiros · No. 3:23-cv-949 (SRU) · Decided December 8, 2025

SUMMARY

The court denies Ian Wright's motion for reargument or reconsideration concerning the timeliness and treatment of his Rule 59(e) motion. The court explains that the Rule 59(e) deadline could not be extended, but permits Wright to proceed with a Rule 60(b) motion or waive it and pursue his pending appeal.

CASE DETAILS

COURT	United States District Court for the District of Connecticut
WRITING FOR THE COURT	Stefan R. Underhill
JURISDICTION	United States District Court for the District of Connecticut
DECIDED	December 8, 2025
DOCKET	3:23-cv-949 (SRU)
DISPOSITION	dismissed
PROCEDURAL POSTURE	The plaintiff moved for reargument or reconsideration after the court denied or declined to treat his untimely Rule 59(e) motion as timely. The court denied the motion and directed the plaintiff either to proceed under Rule 60(b) or waive that motion and pursue his pending appeal.
PRECEDENTIAL VALUE	Unpublished district court order; generally nonprecedential.
PARTIES	Ian Wright v. Angel Quiros, et al.

TOPICS

- motion for reconsideration
- motion to amend
- appellate procedure
- civil procedure
- remedies

PRACTICE AREAS

- Civil procedure
- Federal appellate procedure
- Post-judgment remedies
- Prisoner civil rights

QUESTIONS PRESENTED

1. Whether the court could extend the time for Wright to file a Rule 59(e) motion beyond the 28-day period.

2. Whether Wright's untimely Rule 59(e) motion could be treated as a Rule 60(b) motion.
3. Whether Rule 60(b)(1) permits relief from a final judgment based on a judge's substantial error of law.
4. Whether Wright's motion for reargument or reconsideration should be granted.

HOLDINGS

1. A court may not extend the time for filing a Rule 59(e) motion beyond Rule 59(e)'s 28-day deadline.
2. An untimely Rule 59(e) motion may be construed as a Rule 60(b) motion where the circumstances permit, because Rule 60(b) motions are not subject to the 28-day Rule 59(e) deadline.
3. The term 'mistake' in Rule 60(b)(1) includes a judge's errors of law.

KEY QUOTATIONS

“a court may not extend the time for a plaintiff to file a Rule 59(e) motion past the 28-day time frame outlined in Rule 59(e).”

“The Supreme Court has held that the word “mistake” in Rule 60(b)(1) “includes a judge’s errors of law.””

FACTUAL BACKGROUND

Judgment was entered on October 1, 2025. Wright filed his Rule 59(e) motion on November 18, 2025, more than 28 days after entry of judgment, after misunderstanding an October 22 order that extended only the time to file a notice of appeal. Because the court recognized that its order contributed to the confusion and Wright was proceeding pro se, it construed the untimely Rule 59(e) motion as a Rule 60(b) motion.

PROCEDURAL HISTORY

Wright filed motions seeking extensions of time to file a notice of appeal and a Rule 59(e) motion. The court granted an extension for the notice of appeal under Federal Rule of Appellate Procedure 4(a)(5)(C), but did not and could not extend the Rule 59(e) deadline beyond 28 days. Wright subsequently filed his Rule 59(e) motion more than six weeks after judgment, and the court construed it as a Rule 60(b) motion. Wright then moved for reargument or reconsideration, which the court denied.

DISPOSITION

dismissed

REMAND INSTRUCTIONS

No remand. Wright was directed to file a notice by December 22, 2025 stating whether he wished to pursue a Rule 60(b) motion. If he proceeded under Rule 60(b), he was required to submit briefing by January 26, 2026, after which defendants would have 21 days to respond.

CASES CITED

- Banister v. Davis, 590 U.S. 504, 507-08 (2020)

- Matheson v. Deutsche Bank Natl. Tr. Co., 706 F. App'x 24, 26 (2d Cir. 2017)
- Kemp v. United States, 596 U.S. 528, 532 (2022)

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