

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
VIRGINIA, ROANOKE DIVISION

Garfield William Holley v. Mr. J. Combs, et al.

Holley · No. 7:20-cv-00545 · Decided January 29, 2026

SUMMARY

The United States District Court for the Western District of Virginia grants Garfield William Holley's motion for leave to file an amended complaint in his 42 U.S.C. § 1983 action concerning prisoner transport and medical treatment. The court directs Holley to file a single, self-contained amended pleading within thirty days and explains the applicable pleading requirements. The document also includes the court's pro se prisoner amended-complaint form.

CASE DETAILS

COURT	United States District Court for the Western District of Virginia, Roanoke Division
WRITING FOR THE COURT	Elizabeth K. Dillon
JURISDICTION	United States District Court for the Western District of Virginia, Roanoke Division
DECIDED	January 29, 2026
DOCKET	7:20-cv-00545
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff's request for leave to amend his complaint was construed as a motion under Federal Rule of Civil Procedure 15(a)(2) while defendants' partial motion to dismiss remained pending.
PRECEDENTIAL VALUE	unpublished
PARTIES	Garfield William Holley v. Mr. J. Combs, Edwards, M. Wynn, Lawson, Muncy

TOPICS

[motion to amend](#) [pleadings](#) [prisoners rights](#) [section 1983](#) [appellate procedure](#)

PRACTICE AREAS

[civil rights](#) [prisoner civil rights](#) [federal civil procedure](#)

QUESTIONS PRESENTED

1. Whether Holley should be granted leave to file an amended complaint under Federal Rule of Civil Procedure 15(a)(2).
2. What pleading requirements must govern any amended complaint filed by Holley.

HOLDINGS

1. Leave to amend was granted because Federal Rule of Civil Procedure 15(a)(2) provides that courts should freely give leave to amend when justice so requires.
2. Any amended complaint must be a complete and standalone pleading, clearly identify each defendant and the alleged violation by each defendant, and comply with the requirements for concise, direct, numbered pleadings.

KEY QUOTATIONS

“The amended complaint shall replace plaintiff’s current complaint and all proposed amendments, and it shall constitute the sole complaint in this matter.”

“Plaintiff’s amended complaint must be a new pleading that stands by itself without reference to a complaint, attachments, documents, or amendments already filed.”

FACTUAL BACKGROUND

Holley, a Virginia inmate proceeding pro se, brought claims under 42 U.S.C. § 1983 concerning his transport to an outside facility for a dental appointment and medical treatment for serious medical needs. After the Fourth Circuit determined that he satisfied the imminent-danger exception to the Prison Litigation Reform Act’s three-strikes rule, Holley sought to amend his complaint, including to address a First Amendment claim.

PROCEDURAL HISTORY

Holley filed a pro se 42 U.S.C. § 1983 action concerning his transport for a dental appointment and medical treatment. The court initially dismissed the action under the three-strikes provision of 28 U.S.C. § 1915(g) because Holley had not prepaid the filing fee or shown imminent danger of serious physical injury. The Fourth Circuit held that Holley satisfied the imminent-danger exception and remanded for further proceedings. On remand, the district court granted Holley’s request for leave to file an amended complaint.

DISPOSITION

other

CASES CITED

- *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971)