

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
TENNESSEE

William Joseph Taylor v. Tucker Lane

No. 2:26-CV-24-TAV-CRW (E.D. Tenn. Mar. 12, 2026) · No. No. 2:26-CV-24-TAV-CRW · Decided March 12, 2026

SUMMARY

The United States District Court for the Eastern District of Tennessee grants William Joseph Taylor leave to proceed in forma pauperis. The court dismisses his § 1983 action against Tucker Lane as duplicative and malicious because Taylor had a pending action based on the same legal-mail withholding allegations. The court also assesses the statutory filing fee and certifies that an appeal would not be taken in good faith.

CASE DETAILS

COURT	United States District Court for the Eastern District of Tennessee
WRITING FOR THE COURT	Thomas A. Varlan
JURISDICTION	United States District Court for the Eastern District of Tennessee
DECIDED	March 12, 2026
DOCKET	No. 2:26-CV-24-TAV-CRW
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff, a prisoner proceeding pro se, filed a civil-rights complaint and amended complaint and moved to proceed in forma pauperis. The district court granted in forma pauperis status, screened the pleadings under the Prison Litigation Reform Act, and dismissed the action as duplicative and malicious.
STANDARD OF REVIEW	Screening under 28 U.S.C. §§ 1915A(b) and 1915(e)(2)(B), applying the Rule 12(b)(6) plausibility standard and liberally construing a pro se civil-rights complaint.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion and order; nonprecedential
PARTIES	William Joseph Taylor v. Tucker Lane

TOPICS

prisoners rights

section 1983

civil rights

civil procedure

motions to dismiss

PRACTICE AREAS

prisoner civil rights

federal civil procedure

in forma pauperis litigation

QUESTIONS PRESENTED

1. Whether the complaint should be dismissed at PLRA screening because it duplicates a previously filed and still-pending action involving the same substantive allegations.
2. Whether a duplicative prisoner complaint may be dismissed as malicious when the earlier action remains pending.
3. Whether Taylor should be permitted to proceed in forma pauperis and have the filing fee collected under the PLRA.

HOLDINGS

1. The action was duplicative because it involved the same substantive legal-mail allegations as Taylor's earlier pending § 1983 action, leaving little or nothing to be determined in the present action.
2. Because Taylor's prior duplicative action remained pending, the court dismissed this action as malicious.
3. Taylor's motion to proceed in forma pauperis was granted, subject to payment of the statutory civil filing fee through deductions from his inmate trust account.

KEY QUOTATIONS

“Thus, to survive an initial review under the PLRA, a complaint “must contain sufficient factual matter, accepted as true, to ‘state a claim to relief that is plausible on its face.’””

“However, as Plaintiff acknowledges in his complaints, Plaintiff previously filed a § 1983 complaint that is proceeding against Gilliam and another Defendant regarding the same legal mail withholdings.”

“Moreover, as Plaintiff’s prior-filed duplicative action is still pending, the Court will DISMISS this action as malicious.”

FACTUAL BACKGROUND

William Joseph Taylor, an inmate at the Sullivan County Jail, alleged that Tucker Lane withheld Taylor's legal mail during Taylor's Sullivan County confinement at the request of Michelle Gilliam. Taylor acknowledged that he had already filed a pending § 1983 action concerning the same legal-mail withholdings, and that action included claims against Gilliam and another defendant.

PROCEDURAL HISTORY

Taylor filed this action under 42 U.S.C. § 1983 concerning alleged withholdings of his legal mail while confined in Sullivan County. The court determined that Taylor had already filed a pending action in the same district involving the same substantive allegations and that the proper course for pursuing claims against Lane was to

seek Lane's addition in that earlier case. The court therefore dismissed this action as malicious and certified that any appeal would not be taken in good faith.

DISPOSITION

dismissed

CASES CITED

- Taylor v. Gilliam, et al., No. 2:25-CV-75 (E.D. Tenn.)
- Benson v. O'Brian, 179 F.3d 1014 (6th Cir. 1999)
- Ashcroft v. Iqbal, 556 U.S. 662 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544 (2007)
- Hill v. Lappin, 630 F.3d 468, 470-71 (6th Cir. 2010)
- Haines v. Kerner, 404 U.S. 519, 520 (1972)
- Smith v. S.E.C., 129 F.3d 356, 360-61 (6th Cir. 1997)
- Houston v. Caruso, No. 2:08-CV-124, 2009 WL 579411, at *1 (W.D. Mich. Mar. 5, 2009)
- Colorado River Water Conservation District v. United States, 424 U.S. 800, 817 (1976)
- Sanders v. Washington, 582 F. Supp. 3d 543, 548 (W.D. Mich. 2022)
- Daker v. Ward, 999 F.3d 1300, 1308 (11th Cir. 2021)
- Skudnov v. U.S. Department of Housing and Urban Development, No. 3:15-CV-100, 2015 WL 3892422, at *3 (W.D. Ky. June 24, 2015)

OPINION

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE WILLIAM JOSEPH TAYLOR,)) Plaintiff,)) v.) No. 2:26-CV-24-TAV-CRW) TUCKER LANE,)) Defendant.) MEMORANDUM OPINION AND ORDER Plaintiff, an inmate of the Sullivan County Jail, filed a pro se complaint and amended complaint challenging numerous withholdings of his legal mail during his Sullivan County confinement [Docs.

1, 4] and a motion for leave to proceed in forma pauperis [Doc. 5]. For the reasons set forth below, Plaintiff's motion [Doc. 5] will be GRANTED. Also, as Plaintiff already has a pending case in this District based on the same substantive allegations he seeks to bring herein, Taylor v. Gilliam, et al., No. 2:25-CV-75 (E.D. Tenn), the Court will DISMISS this action as duplicative and malicious.

I. MOTION TO PROCEED IN FORMA PAUPERIS As it appears from Plaintiff's motion that he cannot pay the filing fee in a lump sum, his motion for leave to proceed in forma pauperis [Doc. 5] is GRANTED. Because Plaintiff is an inmate, he is ASSESSED the civil filing fee of \$350.00.

The custodian of Plaintiff's inmate trust account is DIRECTED to submit to the Clerk, U.S. District Court, 800 Market Street, Suite 130, Knoxville, Tennessee 37902, twenty percent (20%) of

his preceding monthly income (or income credited to his trust account for the preceding month), but only when such monthly income exceeds ten dollars (\$10.00), until the full filing fee has been paid to the Clerk.

28 U.S.C. § 1915(b)(2). The Clerk is DIRECTED to send a copy of this memorandum and order to the Court's financial deputy and the custodian of inmate trust accounts at Plaintiff's facility to ensure compliance with the Prison Litigation Reform Act ("PLRA") requirements for payment of the filing fee. This memorandum and order shall be placed in Plaintiff's institutional file and follow him if he is transferred to a different facility.

II. COMPLAINT SCREENING A. Screening Standard Under the PLRA, district courts must screen prisoner complaints and sua sponte dismiss any claims that are "frivolous, malicious, or fail[] to state a claim upon which relief may be granted," or "seek[] monetary relief from a defendant who is immune from such relief." 28 U.S.C. § 1915A(b); see also 28 U.S.C. § 1915(e)(2)(B); *Benson v. O'Brian*, 179 F.3d 1014 (6th Cir.

1999). The dismissal standard the Supreme Court articulated in *Ashcroft v. Iqbal*, 556 U.S. 662 (2009) and *Bell Atlantic Corporation v. Twombly*, 550 U.S. 544 (2007) "governs dismissals for failure to state a claim under [28 U.S.C. §§ 1915(e)(2)(B) and 1915A] because the relevant statutory language tracks the language in Rule 12(b)(6)" of the Federal Rules of Civil Procedure.

Hill v. Lappin, 630 F.3d 468, 470–71 (6th Cir. 2010) (citations omitted). Thus, to survive an initial review under the PLRA, a complaint "must contain sufficient factual matter, accepted as true, to 'state a claim to relief that is plausible on its face.'" *Iqbal*, 556 U.S. at 678 (quoting *Twombly*, 550 U.S. at 570). Allegations that give rise to a mere possibility that a plaintiff might later establish undisclosed facts supporting recovery are not well-pled and do not state a plausible claim.

Twombly, 550 U.S. at 555, 570. Further, formulaic and conclusory recitations of the elements of a claim that are not supported by specific facts are insufficient to state a plausible claim for relief. *Iqbal*, 556 U.S. at 681.

However, courts should liberally construe pro se pleadings filed in civil rights cases and hold them to a less stringent standard than "formal pleadings drafted by lawyers." *Haines v. Kerner*, 404 U.S. 519, 520 (1972). A claim for violation of 42 U.S.C. § 1983 requires a plaintiff to establish that a person acting under color of state law deprived him a federal right.

42 U.S.C. § 1983. B. Analysis Plaintiff's complaints allege that, pursuant to Michelle Gilliam's request, Defendant Tucker Lane withheld legal mail from Plaintiff during his Sullivan County confinement [Docs. 1, 4].

However, as Plaintiff acknowledges in his complaints, Plaintiff previously filed a § 1983 complaint that is proceeding against Gilliam and another Defendant regarding the same legal mail

withholdings. See *Taylor v. Gilliam, et al.*, No. 2:25-CV-75 (E.D. Tenn).¹ Thus, the Court finds that the present action is duplicative. See *Smith v. S.E.C.*, 129 F.3d 356, 361 (6th Cir.

1997) (providing that, to be duplicative, a case “‘must be materially on all fours with the other.... [T]he issues ‘must have such an identity that a determination in one action leaves little or nothing to be determined in the other.’”); see also *Houston v. Caruso*, No. 2:08-CV-124, 2009 WL 579411, at *1 (W.D. Mich. Mar. 5, 1 Notably, in Plaintiff’s other pending lawsuit, he has filed a motion to add Lane as a Defendant, *id.* at Doc.

54, which is the proper way to pursue the claims he seeks to bring herein. 2009) (“Where the factual allegations are the same and the actions of the newly named defendants merely formed a partial basis for the previous suit, the suit against the new defendants may be found to be duplicative.” (citing *Bailey v. Johnson*, 846 F.2d 1019, 1021 (5th Cir. 1988) for its affirmance of a dismissal of a prisoner’s second § 1983 complaint where the second complaint named different defendants)).

Federal courts try to avoid “duplicative litigation.” *Smith*, 129 F.3d at 360 (citing *Colorado River Water Conservation Dist. v. United States*, 424 U.S. 800, 817 (1976)). Moreover, as Plaintiff’s prior-filed duplicative action is still pending, the Court will DISMISS this action as malicious. *Sanders v. Washington*, 582 F. Supp. 3d 543, 548 (W.D. Mich. 2022) (collecting cases that “conclude that a ‘duplicative complaint is an abuse of the judicial process and is properly dismissed without prejudice as malicious’ for prisoners suing governmental entities and those proceeding in forma pauperis” (citing *Daker v. Ward*, 999 F.3d 1300, 1308 (11th Cir.

2021)))”; *Skudnov v. U.S. Dep’t of HUD*, No. 3:15-CV-100, 2015 WL 3892422, at *3 (W.D. Ky. June 24, 2015) (finding “[a] complaint is malicious when it ‘duplicates allegations of another [] federal lawsuit by the same plaintiff’”) (citation omitted). III. CONCLUSION For the reasons set forth above: 1. Plaintiff’s motion for leave to proceed in forma pauperis [Doc.

5] is GRANTED; 2. The custodian of Plaintiff’s inmate trust account is DIRECTED to submit the filing fee to the Clerk in the manner set forth above; 3. The Clerk is DIRECTED to mail a copy of this memorandum and order to the custodian of inmate accounts at the institution where Plaintiff is now confined and to the Court’s financial deputy; 4. This action will be DISMISSED as malicious; and 5.

The Court CERTIFIES that any appeal from this action would not be taken in good faith and would be totally frivolous. See Rule 24 of the Federal Rules of Appellate Procedure. AN APPROPRIATE JUDGMENT ORDER WILL ENTER. s/ Thomas A. Varlan UNITED STATES DISTRICT JUDGE

