

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PRECEDENTIAL VALUE	unpublished district court memorandum opinion and order; nonprecedential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)