

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
LOUISIANA

Catherine Brown v. Minyango Tokpah, et al.

Brown v. Tokpah, Civil Action No. 21-1844 (E.D. La. Apr. 9, 2026) · No. 21-1844 · Decided April 9, 2026

SUMMARY

The United States District Court for the Eastern District of Louisiana denied two motions for attorney’s fees filed by a non-party and by previously dismissed defendants. The court held that the movants had not shown by clear and convincing evidence that Plaintiff acted in bad faith, vexatiously, wantonly, or for oppressive reasons. The court also concluded that Plaintiff’s refusal to honor an alleged redaction agreement and her filing of claims in a forum lacking personal jurisdiction did not warrant sanctions.

CASE DETAILS

COURT	United States District Court for the Eastern District of Louisiana
WRITING FOR THE COURT	Triche Milazzo
JURISDICTION	United States District Court for the Eastern District of Louisiana
DECIDED	April 9, 2026
DOCKET	21-1844
DISPOSITION	other
PROCEDURAL POSTURE	The district court considered a non-party intervenor's motion for attorney's fees and a motion for attorney's fees filed by previously dismissed defendants, both seeking sanctions under the court's inherent authority based on alleged bad-faith litigation conduct.
STANDARD OF REVIEW	A court may use its inherent authority to award attorney's fees as a sanction for bad-faith, vexatious, wanton, or oppressive conduct, but that authority must be exercised with restraint and discretion, and bad faith must be established by clear and convincing evidence.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Catherine Brown v. Minyango Tokpah, Andrea Stewart, Gerald Palmer, Anti Fraud Warriors, LLC

TOPICS

attorney fees

sanctions

personal jurisdiction

civil procedure

remedies

PRACTICE AREAS

civil procedure

remedies

attorney fees

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personal jurisdiction

QUESTIONS PRESENTED

1. Whether D.M. was entitled to attorney's fees under the court's inherent authority based on Brown's alleged misuse of the litigation, refusal to honor an alleged redaction agreement, and public allegations concerning D.M.
2. Whether the previously dismissed defendants were entitled to attorney's fees under the court's inherent authority based on Brown's alleged bad-faith accusations and filing of claims in a forum lacking personal jurisdiction.

HOLDINGS

1. Attorney's fees were unwarranted because D.M. failed to prove by clear and convincing evidence that Brown acted in bad faith, vexatiously, wantonly, or for oppressive reasons.
2. The dismissed defendants were not entitled to attorney's fees because they did not establish by clear and convincing evidence that Brown's claims or jurisdictional arguments were made in bad faith.

KEY QUOTATIONS

"Each litigant pays his own attorney's fees, win or lose, unless a statute or contract provides otherwise."
(Legal Standard)

"A court should invoke its inherent power to award attorney's fees only when it finds that 'fraud has been practiced upon it, or that the very temple of justice has been defiled.'" (Legal Standard)

"For the foregoing reasons, both D.M.'s Motion for Attorney's Fees (Doc. 101) and Defendants Andrea Stewart, and Anti Fraud Warriors, LLC's Motion for Attorney's Fees (Doc. 105) are DENIED." (Conclusion)

FACTUAL BACKGROUND

Brown filed claims against various defendants based on alleged online stalking, harassment, threats, attacks, intimidation, and defamation. The court dismissed claims against Andrea Stewart, Gerald Palmer, and Anti Fraud Warriors, LLC for lack of personal jurisdiction. Brown later included allegations concerning non-party D.M. in filings, and the court ordered redaction of references to D.M.'s legal name. D.M. and the dismissed defendants sought attorney's fees based on alleged bad-faith conduct, but the court found no clear and convincing evidence of sanctionable behavior.

PROCEDURAL HISTORY

Brown filed suit alleging that the defendants engaged in online stalking, harassment, threats, attacks, intimidation, or defamation. The court previously dismissed the claims against Stewart, Palmer, and Anti Fraud Warriors, LLC for lack of personal jurisdiction. After intervenor D.M. obtained partial relief requiring redaction

of references to her legal name, D.M. and the dismissed defendants separately moved for attorney's fees and sanctions; the court denied both motions.

DISPOSITION

other

CASES CITED

- Marx v. Gen. Revenue Corp., 568 U.S. 371, 382 (2013)
- Hardt v. Reliance Standard Life Ins. Co., 560 U.S. 242, 253 (2010)
- Chambers v. NASCO, Inc., 501 U.S. 32, 45-46 (1991)
- Roadway Express, Inc. v. Piper, 447 U.S. 752, 765 (1980)
- Alyeska Pipeline Serv. Co. v. Wilderness Soc'y, 421 U.S. 240, 258-59 (1975)
- Maguire Oil Co. v. The City of Houston, 143 F.3d 205, 209 (5th Cir. 1998)
- Chaves v. M/V Medina Star, 47 F.3d 153, 156 (5th Cir. 1995)
- Boland Marine & Mfg. Co. v. Rihner, 41 F.3d 997, 1005 (5th Cir. 1994)
- Hammervold v. Blank, 3 F.4th 803, 811 (5th Cir. 2021)
- In re Moore, 739 F.3d 724, 730 (5th Cir. 2014)
- Sealed Appellant v. Sealed Appellee, No. 22-50707, 2024 WL 980494, at *2-*3 (5th Cir. Mar. 7, 2024)
- Procaccino v. Jeansonne, No. 07-4748, 2017 WL 6733722, at *4 (E.D. La. Dec. 29, 2017)
- Matta v. May, 118 F.3d 410, 416 (5th Cir. 1997)
- McKethan v. Tex. Farm Bureau, 35 F.3d 559, 1994 WL 499701, at *3 (5th Cir. 1994) (unpublished table decision)
- Christianburg Garment Co. v. Equal Emp. Opportunity Comm'n, 434 U.S. 412, 421-422 (1978)