

United States Court of Appeals
for the Fifth Circuit

United States Court of Appeals
Fifth Circuit

FILED

August 17, 2026

Lyle W. Cayce
Clerk

No. 26-30139
Summary Calendar

MAURICE WILLIAMS,

Plaintiff—Appellant,

versus

TOWN OF CLINTON; CHARLES BROWN, *Individually,*

Defendants—Appellees.

Appeal from the United States District Court
for the Middle District of Louisiana
USDC No. 3:23-CV-119

Before HAYNES, GRAVES, and RAMIREZ, *Circuit Judges.*

PER CURIAM:*

Following his arrest by a Town of Clinton, Louisiana (the “Town”), police officer, Maurice Williams filed federal and state claims against the Town and the officer. The district court dismissed all claims. As explained below, we AFFIRM.

* This opinion is not designated for publication. *See* 5TH CIR. R. 47.5.

No. 26-30139

I. Background

In October 2021, Officer Charles Brown of the Town's police department issued Williams a misdemeanor summons under the Town's "dogs not to run at large" ordinance, with a court date of December 7, 2021. Though Williams did not attend because he claims he was unable to appear in response to this summons because the court was not in session on that day, a warrant was issued for Williams's arrest for failure to appear.

On February 28, 2022, the district attorney contacted Williams to inform him of the warrant. On the morning of March 2, Officer Brown went to Williams's residence to execute the warrant and arrest Williams. Williams alleges that the following occurred during execution of the arrest:

Officer Brown needlessly pepper[-]sprayed Williams, beat Williams, and caused serious bodily harm to Williams'[s] neck. Officer Brown grabbed [Williams's] left hand and shoved it in between his shoulder blades, slammed his face into a door, injuring his head, all while [Williams] was barefoot and with a cast on one arm. [Williams] did not resist arrest, and at age 70, would be no threat to an officer.

In February 2023, Williams filed suit in federal court against the Town and Officer Brown in his individual capacity. After the district court dismissed various claims in the original complaint, Williams filed an amended complaint asserting claims under 42 U.S.C. § 1983 for false arrest, illegal seizure and excessive force,¹ and malicious prosecution and, under state law, for battery, false arrest, defamation, and malicious prosecution.

¹ Williams's amended complaint refers to this claim as "illegal seizure and excessive force" once, otherwise addressing only excessive force. While the district court acknowledges Williams's claim of "illegal seizure and excessive force," it also goes on to only address excessive force. Williams's briefing does the same, and it seems to clear up

No. 26-30139

Defendants moved for summary judgment as to all claims, arguing that they were entitled to judgment as a matter of law for all claims and that Officer Brown was entitled to qualified immunity. The district court granted summary judgment on the federal and state false arrest claims, federal and state malicious prosecution claims, and state defamation claim. It denied summary judgment on the federal excessive force claim against the Town and on the state battery claim against both defendants, but it granted summary judgment on the federal excessive force claim against Officer Brown because it found he was entitled to qualified immunity such that this issue was not available against the Town. The district court declined to exercise supplemental jurisdiction over the remaining state law claims. The district court entered a final judgment disposing of all claims, and Williams promptly appealed.

II. Jurisdiction & Standard of Review

The district court had jurisdiction over this case under 28 U.S.C. §§ 1331 and 1343 because Williams brought claims under 42 U.S.C. § 1983. We have jurisdiction over this appeal under 28 U.S.C. § 1291 because the district court entered a final judgment.

“We review a district court’s grant of summary judgment de novo, applying the same standards as the district court.” *Hagen v. Aetna Ins. Co.*, 808 F.3d 1022, 1026 (5th Cir. 2015). We also review de novo a district court’s determination of entitlement to qualified immunity. *Trammell v. Fruge*, 868 F.3d 332, 338 (5th Cir. 2017).

this issue by addressing the constitutionality and reasonableness of a seizure in the context of alleged excessive force. As such, we address this claim as an excessive force claim.

No. 26-30139

III. Discussion

On appeal, Williams argues that the district court erred in: (A) granting Officer Brown qualified immunity as to Williams's § 1983 excessive force claim, and (B) granting summary judgment on Williams's false arrest and malicious prosecution claims under federal and state law. We address each argument in turn.²

A. Qualified Immunity

First, Williams argues that the district court erred in granting Officer Brown qualified immunity as to his § 1983 excessive force claim.³ We disagree.

Once a defendant pleads qualified immunity, the burden on summary judgment “then shifts to the plaintiff, who must rebut the defense by establishing a genuine fact issue as to whether the official’s allegedly wrongful conduct violated clearly established law.” *Trammell*, 868 F.3d at 338 (citation omitted). The two-part inquiry asks “first, whether taken in the light most favorable to the party asserting the injury, the facts alleged show the officer’s conduct violated a constitutional right; and second, whether the right was clearly established.” *Id.* at 339 (citation modified).

² The Town argues that its “liability is wholly derivative, and only the state law claims reach it on appeal. Because we don’t have to reach that argument, we do not address it.

³ While Williams states that the district court found both defendants entitled to qualified immunity, it only did so as to Officer Brown. This was proper, as qualified immunity only applies to individual state officials. *See Stidham v. Tex. Comm’n on Priv. Sec.*, 418 F.3d 486, 490 (5th Cir. 2005) (“Qualified immunity shields state officials from personal suits when they act in their official capacity[.]”). Of course, as a result, the Town is not in *Monell*.

No. 26-30139

The district court found that Williams did not meet his burden, as Williams's "conclusory allegation that Brown acted with malice" was insufficient. We agree with the district court that Officer Brown is entitled to qualified immunity.

B. Summary Judgment

Second, Williams argues that the district court erred in granting summary judgment regarding Williams's false arrest and malicious prosecution claims. But again, we agree with the district court.

Summary judgment is proper "if the movant shows that there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law." FED. R. CIV. P. 56(a).

We address summary judgment as to each claim in turn.

1. *False arrest*

The district court denied Williams's federal and state false arrest claims because "[Officer] Brown conducted the arrest pursuant to a facially valid bench warrant." We agree. Under federal law, "[i]f there was probable cause for any of the charges made[,]" then the arrest was supported by probable cause, and the claim for false arrest fails." *Deville v. Marcantel*, 567 F.3d 156, 164 (5th Cir. 2009) (per curiam) (citation modified). Likewise, under Louisiana law, "[a] facially valid arrest warrant immunizes the officers from false arrest and imprisonment claims." *Id.* at 172.

As such, summary judgment as to the false arrest claims was proper.

2. *Malicious prosecution*

We also agree with the district court's decision to grant summary judgment concerning Williams's federal and state malicious prosecution claims.

No. 26-30139

Because the elements of a § 1983 malicious prosecution claim and the elements of a Louisiana state malicious prosecution claim are “coextensive,” *Armstrong v. Ashley*, 60 F.4th 262, 279 (5th Cir. 2023) (citation omitted), we analyze them simultaneously. In this circuit, the plaintiff must show:

- (1) the commencement or continuance of an original criminal proceeding;
- (2) its legal causation by the present defendant against plaintiff who was defendant in the original proceeding;
- (3) its bona fide termination in favor of the present plaintiff;
- (4) the absence of probable cause for such proceeding;
- (5) malice; and
- (6) damages.

Espinal v. City of Hou., 96 F.4th 741, 748 (5th Cir. 2024).

Because, for the same reasons as above, we find that the arrest was supported by probable cause, Williams failed to show a genuine dispute of material fact as to the fourth element, and summary judgment was appropriate.

IV. Conclusion

Accordingly, we AFFIRM.