

25-6029
No. -

ORIGINAL

IN THE SUPREME COURT OF THE UNITED STATES

Supreme Court, U.S.
FILED

OCT 31 2025

OFFICE OF THE CLERK

KEITH BALDWIN, JR., *Petitioner,*

v.

JAMEY FLETCHER, Captain of Maiden Police Department, *Respondent.*

ON PETITION FOR WRIT OF CERTIORARI TO THE UNITED STATES COURT OF
APPEALS FOR THE FOURTH CIRCUIT

PETITION FOR WRIT OF CERTIORARI

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QUESTIONS PRESENTED

1. Discovery Rights in § 1983 Cases: Whether federal district courts must allow § 1983 plaintiffs reasonable discovery to develop facts regarding defendants' affirmative defenses before dismissing claims under Federal Rule of Civil Procedure 12(b)(6), or whether courts may resolve disputed factual issues regarding constitutional violations including the existence and validity of search warrants based solely on defendants' unverified documentary submissions while simultaneously denying plaintiffs' motions for discovery as "premature."

2. Miranda Custody Standard: Whether the determination of "custody" for Miranda purposes requires a totality-of-circumstances analysis considering the duration of detention, physical threats by officers, restriction of movement, and coercive atmosphere, or whether the absence of formal arrest is dispositive regardless of other objective indicia that a reasonable person would not feel free to leave.

3. Qualified Immunity Standard: Whether the "clearly established law" requirement for overcoming qualified immunity in § 1983 actions requires precedent with nearly identical facts, or whether well-established constitutional principles from this Court's precedents suffice when applied to analogous governmental conduct involving prolonged detention, threats of violence, and warrantless searches.

PARTIES TO THE PROCEEDING

Petitioner Keith Baldwin, Jr. was the plaintiff in the district court and appellant in the court of appeals.

Respondent Jamey Fletcher, sued in his individual and official capacity as Captain of the Maiden Police Department, was the defendant in the district court and appellee in the court of appeals.

The Maiden Police Department was also named as a defendant in the district court but was dismissed as a non-suable entity on February 21, 2024, and is not a party to this petition.

CORPORATE DISCLOSURE STATEMENT

Not applicable. Petitioner is an individual.

DIRECTLY RELATED PROCEEDINGS

- *Keith Baldwin, Jr. v. Jamey Fletcher*, U.S. Court of Appeals for the Fourth Circuit, No. 24-2210 (decided Aug. 25, 2025)
- *Keith Baldwin, Jr. v. Maiden Police Department and Jamey Fletcher*, U.S. District Court for the Western District of North Carolina, Civil Action No. 5:23-cv-00197-KDB-DCK (decided Dec. 2, 2024)

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OPINIONS BELOW

The opinion of the United States Court of Appeals for the Fourth Circuit (App. 1a-2a) is unpublished and is reported at *Baldwin v. Fletcher*, No. 24-2210 (4th Cir. Aug. 25, 2025). The order of the United States District Court for the Western District of North Carolina (App. 3a-19a) is unpublished and is reported at *Baldwin v. Fletcher*, No. 5:23-cv-00197-KDB-DCK (W.D.N.C. Dec. 2, 2024).

STATEMENT OF JURISDICTION

This Court has jurisdiction under 28 U.S.C. § 1254(1). The United States Court of Appeals for the Fourth Circuit entered judgment on August 25, 2025 (App. 20a). The mandate issued on September 16, 2025 (App. 21a). No petition for rehearing was filed. This petition is filed within 90 days of entry of judgment and is timely under Supreme Court Rule 13.1.

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

U.S. Constitution, Amendment IV:

"The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized."

U.S. Constitution, Amendment V:

"No person shall be held to answer for a capital, or otherwise infamous crime, unless on a presentment or indictment of a Grand Jury, except in cases arising in the land or naval forces, or in the Militia, when in actual service in time of War or public danger; nor shall any person be

subject for the same offence to be twice put in jeopardy of life or limb; nor shall be compelled in any criminal case to be a witness against himself, nor be deprived of life, liberty, or property, without due process of law; nor shall private property be taken for public use, without just compensation."

U.S. Constitution, Amendment XIV, Section 1:

"All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws."

42 U.S.C. § 1983:

"Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress, except that in any action brought against a judicial officer for an act or omission taken in such officer's judicial capacity, injunctive relief shall not be granted unless a declaratory decree was violated or declaratory relief was unavailable..."

STATEMENT OF THE CASE

A. Factual Background

Keith Baldwin, Jr. operated a martial arts school in Maiden, North Carolina. On July 7, 2021, Respondent Captain Jamey Fletcher of the Maiden Police Department, along with other officers, arrived at Petitioner's business at 3556 U.S. Highway 321 based on an anonymous report that Petitioner, a convicted felon, possessed a firearm. App. 4a.

What followed was, according to Petitioner's allegations, a seven-hour ordeal involving multiple constitutional violations:

Warrantless Entry and Search: Despite Petitioner's allegations of a warrantless entry, Respondent claimed to possess a valid search warrant. App. 10a-11a. Petitioner consistently alleged the entry was without warrant or consent. App. 4a, 26a.

Prolonged Detention and Coercive Interrogation: For approximately seven hours, officers restricted Petitioner's movement on his own property and subjected him to custodial interrogation without Miranda warnings. App. 4a, 11a-12a. During this detention:

- Petitioner was not free to move about his property or leave
- Officers threatened him with physical violence, stating they would "take [Plaintiff] out to the floor and beat [him]" App. 4a
- Officers coerced Petitioner into surrendering a firearm belonging to his domestic partner

Seizure of Property: Officers seized various personal items, including a security DVR box, which was not returned despite the Petitioner's requests. App. 5a.

Subsequent Pattern of Harassment: The July 7, 2021, incident was followed by a pattern of harassment and retaliation extending through May 2022, including:

- Forced appearance at the police station on July 8, 2021, where Petitioner was detained and threatened with weapons App. 5a
- Additional warrantless interrogations and business intrusions
- Display of naked photographs of Petitioner's children's mother obtained from illegally seized property App. 8a
- Racially charged comments and suggestions that Petitioner's business should relocate App. 6a-7a

B. Procedural History

Initial Pleading: Petitioner filed his initial complaint on December 13, 2023, naming both the Maiden Police Department and Captain Fletcher as defendants. The complaint alleged violations of the First, Fourth, Fifth, Sixth, and Fourteenth Amendments under 42 U.S.C. § 1983.

Motion to Dismiss Maiden Police Department: On February 7, 2024, the Maiden Police Department moved to dismiss, arguing it was not a suable entity under North Carolina law. The court granted this motion on February 21, 2024. App. 27a-31a.

Discovery Motion Denied: On February 20, 2024, Petitioner filed a "Motion to Proceed to Discovery Phase" seeking to develop factual evidence regarding the alleged warrant and other disputed issues. App. 28a. The magistrate judge denied this motion on February 21, 2024, as "premature" due to the pending motion to dismiss. App. 12a.

Amended Complaint: After various procedural motions, Petitioner was granted leave to file an amended complaint on July 8, 2024. The amended complaint contained more detailed allegations regarding the constitutional violations. App. 26a.

Motion to Dismiss Amended Complaint: Respondent Fletcher moved to dismiss the amended complaint on multiple grounds, including failure to state a claim and qualified immunity. App. 30a.

District Court Decision: On December 2, 2024, the district court granted Respondent's motion to dismiss, ruling that:

1. Fourth Amendment claims failed because a valid search warrant existed (taking judicial notice of an unverified warrant document)
2. Fifth Amendment claims failed because Petitioner was not in "custody" under Miranda, and his statements were not used against him at trial
3. Respondent was entitled to qualified immunity on all constitutional claims
4. State law claims were dismissed without prejudice for lack of supplemental jurisdiction

Fourth Circuit Appeal: Petitioner appealed pro se. On August 25, 2025, the Fourth Circuit issued an unpublished per curiam opinion stating only: "We have reviewed the record and find no reversible error. Accordingly, we affirm the district court's order." App. 1a-2a.

The court noted it was "dispensing with oral argument because the facts and legal contentions are adequately presented in the materials before this court and argument would not aid the decisional process." App. 2a.

REASONS FOR GRANTING THE WRIT

The decision below presents three questions of exceptional importance that warrant this Court's review. The Fourth Circuit's summary affirmance, with no meaningful analysis of significant constitutional questions, exemplifies troubling trends in civil rights litigation that undermine the deterrent purposes of § 1983. Each question presented affects numerous cases and would benefit from this Court's clarification.

I. The Decision Below Conflicts With This Court's Precedent by Denying Discovery Rights While Resolving Disputed Facts in Defendants' Favor

A. The Procedural Sequence Below Violates Fundamental Fairness

The procedural history below demonstrates a fundamental problem in § 1983 litigation: courts simultaneously deny plaintiffs discovery to develop facts supporting their constitutional claims while resolving factual disputes in favor of defendants based on unverified documentary submissions.

Here, when Petitioner specifically alleged a warrantless search and seven-hour detention, he filed a "Motion to Proceed to Discovery Phase" to develop evidence regarding the existence, validity, and scope of any alleged search warrant. App. 28a. The district court denied this motion as "premature" due to the pending motion to dismiss, then resolved the warrant dispute against Petitioner by taking judicial notice of an unverified warrant document submitted by Respondent.

This approach creates an impossible burden for § 1983 plaintiffs: they cannot obtain discovery before dismissal, but dismissal is granted based on factual disputes resolved against them without discovery.

B. The Decision Conflicts with *Twombly* and *Iqbal*

In *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544 (2007), and *Ashcroft v. Iqbal*, 556 U.S. 662 (2009), this Court clarified that Rule 12(b)(6) should dismiss only those complaints that fail to state a plausible claim for relief. Critically, Rule 12(b)(6) "does not resolve contests surrounding the facts." *Twombly*, 550 U.S. at 555.

Yet that is precisely what happened here. Petitioner alleged a warrantless search; Respondent claimed a warrant existed; and the court resolved this factual dispute against Petitioner without allowing discovery. This approach transforms Rule 12(b)(6) from a pleading standard into a merits determination based on competing factual assertions.

C. The Question Presented Affects Numerous Cases

This procedural problem affects countless § 1983 cases where government defendants assert post hoc justifications for alleged constitutional violations. Law enforcement officers routinely claim after the fact that:

- Search warrants existed for allegedly warrantless searches
- Arrests were based on probable cause despite the plaintiffs' contrary allegations
- Use of force was justified despite excessive force claims

If courts can resolve these disputes on motions to dismiss while denying discovery, § 1983's deterrent function is eviscerated. Government actors face no meaningful accountability because plaintiffs cannot develop evidence of constitutional violations before dismissal.

II. The Decision Below Applies an Overly Restrictive Miranda Custody Standard That Conflicts With This Court's Precedent

A. The District Court Applied a Mechanical Rule Rather Than Totality Analysis

This Court established in *Berkemer v. McCarty*, 468 U.S. 420, 440 (1984), that Miranda custody determinations require examining the totality of circumstances to determine whether "a suspect's freedom of action is curtailed to a degree associated with formal arrest." The inquiry is objective: would a reasonable person in the suspect's position feel free to terminate the interrogation and leave

The district court ignored this standard and applied a mechanical rule that the absence of formal arrest negates custody regardless of other restraints on freedom. App. 12a. The court failed to consider that Petitioner was:

- Detained on his own property for seven hours
- Threatened with physical violence by multiple armed officers
- Prevented from conducting business or leaving the premises
- Surrounded by officers who made clear he was not free to go
- Subjected to coercive questioning designed to elicit incriminating statements

B. Custody Analysis Requires Fact-Specific Inquiry

In *Miranda v. Arizona*, 384 U.S. 436, 444 (1966), this Court emphasized that custody determinations must account for "the interaction of all the circumstances." The Court has repeatedly rejected bright-line rules that ignore the coercive atmosphere of interrogations.

Here, the totality of circumstances, seven-hour detention, threats of violence, restriction of movement, multiple armed officers—clearly suggests a custodial situation. A reasonable person in Petitioner's position would not feel free to end the questioning and leave.

The district court's contrary conclusion rested on the single fact that no formal arrest occurred, ignoring all other objective indicia of custody. This mechanical approach conflicts with *Miranda* and its progeny.

C. The Question Has Recurring Importance

The custody issue arises frequently in cases where law enforcement conducts prolonged investigations at suspects' homes or businesses. Officers often delay formal arrest while creating highly coercive interrogation environments. If courts apply mechanical "no formal arrest, no custody" rules, *Miranda* protections become meaningless in these common scenarios.

The question presented would clarify that custody analysis must consider all objective circumstances, not just the presence or absence of formal arrest.

III. The Qualified Immunity Analysis Improperly Requires Factual Identity Rather Than Analogous Precedent

A. The Decision Below Exemplifies the Problem This Court Identified in *Taylor v. Riojas*

In *Taylor v. Riojas*, 141 S. Ct. 52 (2020), this Court reversed a qualified immunity grant, noting that "there is no need to find a case directly on point" when general constitutional principles clearly establish the law. The Court emphasized that qualified immunity should not protect conduct that violates well-established constitutional principles, even in novel factual scenarios.

The district court's analysis exemplifies the problematic approach *Taylor* rejected. Despite decades of precedent clearly establishing:

- Fourth Amendment warrant requirements (*Payton v. New York*, 445 U.S. 573 (1980))
- *Miranda* protections for custodial interrogation (*Miranda v. Arizona*, 384 U.S. 436 (1966))

- Prohibitions on prolonged detention without probable cause (*Graham v. Connor*, 490 U.S. 386 (1989))
- Bans on coercive interrogation tactics (*Brown v. Mississippi*, 297 U.S. 278 (1936))

The court found these general principles insufficient because no prior case involved the precise factual scenario of a seven-hour business premises detention with threats of violence.

B. Qualified Immunity Should Not Shield Obvious Constitutional Violations

This Court's qualified immunity doctrine protects officials from liability for "reasonable mistakes" about the law's requirements. *Anderson v. Creighton*, 483 U.S. 635, 641 (1987). But the doctrine should not shield conduct that any reasonable officer would know violates clearly established constitutional principles.

Here, no reasonable officer could believe that:

- Seven-hour warrantless detention is constitutional
- Custodial interrogation without Miranda warnings is permissible
- Threatening suspects with violence is lawful
- Entering private property without consent or warrant is justified

These violations are obvious under well-established constitutional principles. Requiring factually identical precedent, as the district court did, transforms qualified immunity from protection for reasonable mistakes into blanket immunity for constitutional violations.

C. The Standard Applied Below Conflicts with This Court's Guidance

In *Harlow v. Fitzgerald*, 457 U.S. 800, 818 (1982), this Court established that qualified immunity protects officials unless their conduct violates "clearly established statutory or constitutional rights of which a reasonable person would have known." The focus is on whether the legal principle was clearly established, not whether the precise factual scenario had been previously litigated.

The district court's approach requiring near-identical precedent conflicts with this standard and with this Court's repeated guidance that qualified immunity should not become a license for constitutional violations.

IV. The Case Presents Questions of Exceptional National Importance

A. The Issues Affect Civil Rights Enforcement Nationwide

The three questions presented arise frequently in federal courts and significantly impact civil rights enforcement:

Discovery Rights: If § 1983 plaintiffs cannot obtain pre-dismissal discovery while defendants can defeat claims through unverified documentary submissions, civil rights litigation becomes illusory.

Miranda Standards: Law enforcement increasingly uses prolonged, coercive interrogations while avoiding formal arrest. Clear guidance on custody standards is essential.

Qualified Immunity: Overly restrictive "clearly established law" requirements effectively immunize obvious constitutional violations, undermining § 1983's deterrent purposes.

B. The Summary Disposition Below Fails to Address Important Constitutional Questions

The Fourth Circuit's cursory affirmance, stating only that it "reviewed the record and found no reversible error," does not guide these recurring legal questions. App. 1a-2a. This approach leaves important constitutional issues unresolved and provides no precedential value for future cases.

Such summary treatment of significant constitutional questions warrants this Court's review to ensure proper analysis of civil rights claims.

CONCLUSION

The decision below presents three questions of exceptional importance that recur frequently in federal courts and significantly impact civil rights enforcement. The Fourth Circuit's summary affirmance, with no analysis of substantial constitutional issues, exemplifies problematic trends in civil rights litigation that undermine § 1983's deterrent purposes.

This Court's review is necessary to:

1. Clarify discovery rights in § 1983 cases before Rule 12(b)(6) dismissal
2. Reaffirm that Miranda custody analysis requires a totality-of-circumstances review
3. Ensure qualified immunity does not shield obvious constitutional violations

For the foregoing reasons, the petition for writ of certiorari should be granted.

Dated: October 6, 2025

Respectfully submitted,

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