NONPRECEDENTIAL DISPOSITION
To be cited only in accordance with FED. R. APP. P. 32.1

United States Court of Appeals

For the Seventh Circuit
Chicago, Illinois 60604

Submitted November 7, 2025*
Decided November 7, 2025

Before

FRANK H. EASTERBROOK, *Circuit Judge*

KENNETH F. RIPPLE, *Circuit Judge*

DORIS L. PRYOR, *Circuit Judge*

No. 24-1759

TITUS HENDERSON,
Plaintiff-Appellant,

v.

MIKE DONOVAN, et al.,
Defendants-Appellees.

Appeal from the United States District Court for the Western District of Wisconsin.

No. 21-cv-562-jdp

James D. Peterson,
Chief Judge.

* We have agreed to decide the case without oral argument because the briefs and record adequately present the facts and legal arguments, and oral argument would not significantly aid the court. FED. R. APP. P. 34(a)(2)(C).

No. 24-1760

TITUS HENDERSON,
Plaintiff-Appellant,

v.

JODIE PERTTU, et al.,
Defendants-Appellees.

Appeal from the United States District Court for the Western District of Wisconsin.

No. 23-cv-346-jdp

James D. Peterson,
Chief Judge.

No. 24-1761

TITUS HENDERSON,
Plaintiff-Appellant,

v.

RACHEL MATUSHAK, et al.,
Defendants-Appellees.

Appeal from the United States District Court for the Western District of Wisconsin.

No. 23-cv-385-jdp

James D. Peterson,
Chief Judge.

O R D E R

Titus Henderson, a Wisconsin prisoner, appeals three dismissed civil-rights cases against prison officials. Before these suits, Henderson had already "struck out" under 28 U.S.C. § 1915(g) and had been sanctioned for repeated misjoinder of claims and parties. After finding Henderson made false statements to the court in a consolidated evidentiary hearing, the district court sanctioned Henderson by dismissing his pending cases and imposing a two-year filing bar for civil suits. Because the district court did not abuse its discretion in doing so, we affirm.

These cases arise from Henderson's incarceration at Green Bay Correctional Institution and concern unrelated events during which he alleges prison officials violated his constitutional rights. *See* 42 U.S.C. § 1983. In June 2023, Henderson moved for a default judgment in each case. He asserted in a sworn declaration that—based on personal knowledge and video evidence—three assistant attorneys general representing

the defendants directed a prison official to confiscate and destroy his legal materials while he was in segregation. The defendants responded by moving for sanctions against Henderson for fabricating the conspiracy.

The district court held an evidentiary hearing in February 2024 to resolve the motions. Before the hearing, the court denied a motion by Henderson to appear in person, so Henderson and some state witnesses appeared remotely. Henderson testified that he did not actually have personal knowledge or video evidence supporting his allegations, as he had asserted in his sworn declaration, but that a prison officer had told him about the scheme. The state presented the officer in question and nine other individuals Henderson had implicated, all of whom denied the allegations. The district court gave Henderson an opportunity to cross-examine each witness. Henderson did not object to appearing pro se, did not identify any technical issues when cross-examining witnesses remotely, and did not object when the district court curtailed certain lines of questioning.

The district court denied Henderson's motions for default judgment and granted the defendants' motion for sanctions after finding that Henderson made multiple false statements to the court. Because his three strikes under the Prison Litigation Reform Act and other prior sanctions had failed to deter his false statements, the district court dismissed Henderson's pending cases and imposed a two-year filing bar without an imminent-danger exception.

On appeal, Henderson first challenges the sanctions, arguing that the two-year filing bar without an imminent-danger exception violates the three-strike rule. *See* 28 U.S.C. § 1915(g). The Act restricts prisoners who have accrued three dismissals for frivolous litigation from filing in forma pauperis except in cases involving imminent danger of serious physical harm. *Id.* But it does not limit district courts' power to sanction other conduct. *See Greyer v. Ill. Dep't of Corr.*, 933 F.3d 871, 880 (7th Cir. 2019). And a district court may use its inherent power to impose a severe sanction—including dismissal with prejudice—after finding a party abused the judicial process or otherwise acted in bad faith. *Fuery v. City of Chicago*, 900 F.3d 450, 463 (7th Cir. 2018).

We review the district court's factual findings for clear error and the sanction it chose for abuse of discretion. *Martin v. Redden*, 34 F.4th 564, 568 (7th Cir. 2022). The finding that Henderson lied to the court was supported by the testimony of ten witnesses and Henderson's contradiction of his own declaration. There was no clear error in the district court's factual finding that Henderson was untruthful. The district court found this severe sanction was necessary because prior sanctions had not deterred

Henderson's fabrications. We have upheld similarly severe sanctions when lesser sanctions would not effectively deter a litigant from lying to the court, *see id.* at 569, so we see no abuse of discretion.

Next, Henderson challenges the fairness of the evidentiary hearing. He submits that the district court should have granted his motion to appear in person at the hearing. We review this decision for abuse of discretion. *Perotti v. Quinones*, 790 F.3d 712, 721 (7th Cir. 2015). The Act requires incarcerated plaintiffs bringing § 1983 claims to appear remotely at pretrial proceedings to the extent practicable. 42 U.S.C. § 1997e(f)(1); *Perotti*, 790 F.3d at 723. Henderson provided no reason for the district court to conclude his remote attendance was not practicable, so the court's denial of his motion was well within its discretion.

Henderson also argues that the district court erred by allowing technical issues to interfere with his cross-examination, cutting off certain lines of questioning, and failing to appoint counsel to represent him. But because he did not raise these arguments in the district court, they are waived. *See Bradley v. Village of University Park*, 59 F.4th 887, 897 (7th Cir. 2023).

AFFIRMED