

UNITED STATES COURT OF APPEALS FOR THE EIGHTH CIRCUIT

Ronald J. Hamilton, Jr. v. Superintendent DeAngelo Earl

No. 25-1187 (8th Cir. Feb. 17, 2026) · No. 25-1187 · Decided February 17, 2026

SUMMARY

The United States Court of Appeals for the Eighth Circuit affirmed summary judgment for Arkansas prison officials in a prisoner’s 42 U.S.C. § 1983 action alleging that exposure to high temperatures without air conditioning violated the Eighth and Fourteenth Amendments. The court held that, even assuming the conditions presented an objectively serious medical risk to a dialysis patient, the record did not show deliberate indifference because officials consulted a physician, addressed medical complaints, continued dialysis treatment, and attempted to mitigate the heat.

CASE DETAILS

COURT	United States Court of Appeals for the Eighth Circuit
WRITING FOR THE COURT	Arnold; Loken; Gruender
JURISDICTION	United States Court of Appeals for the Eighth Circuit
DECIDED	February 17, 2026
DOCKET	25-1187
DISPOSITION	affirmed
PROCEDURAL POSTURE	Hamilton appealed the district court's grant of summary judgment to prison officials on his 42 U.S.C. § 1983 claim, based on qualified immunity.
STANDARD OF REVIEW	De novo review of the grant of summary judgment, viewing the evidence in the light most favorable to Hamilton. Qualified immunity requires asking whether the defendants violated a constitutional right and whether that right was clearly established.
PRECEDENTIAL VALUE	Published opinion; precedential
PARTIES	Ronald J. Hamilton, Jr. v. Superintendent DeAngelo Earl, Ouachita River Correctional Unit, Todd Ball, Bryant Dallas

TOPICS

- prisoners rights
- qualified immunity
- cruel and unusual punishment
- section 1983
- standard of review

PRACTICE AREAS

constitutional law

civil rights litigation

prison litigation

qualified immunity

appellate procedure

QUESTIONS PRESENTED

1. Whether the prison officials violated Hamilton's Eighth and Fourteenth Amendment rights by deliberately disregarding a serious medical need or objectively substantial risk of serious harm associated with housing him in a hot, non-air-conditioned isolation cell while he was on dialysis and subject to a fluid restriction.
2. Whether the defendants were entitled to qualified immunity.
3. Whether summary judgment was properly entered for the defendants.

HOLDINGS

1. The defendants were entitled to qualified immunity because Hamilton failed to show that they acted with deliberate indifference to his serious medical needs or to an objectively substantial risk of serious harm.
2. For purposes of resolving the appeal, the court assumed without deciding that housing a person with kidney disease requiring dialysis in high temperatures for six weeks while subject to a fluid restriction constituted an objectively serious medical need or posed an objectively substantial risk of serious harm.
3. Summary judgment for the defendants was proper because Hamilton's cruel-and-unusual-punishment claim failed as a matter of law on the deliberate-indifference element.

KEY QUOTATIONS

“Qualified immunity “shields government officials from liability when their conduct does not violate clearly established constitutional rights of which a reasonable person would have known.”” (at 3)

“the Eighth and Fourteenth Amendments don’t mandate comfortable prisons, they do prohibit inhumane ones” (at 4)

“The defendants simply aren’t deliberately indifferent for taking the doctor at his word, even if medical personnel who were not physicians had a different opinion.” (at 6)

FACTUAL BACKGROUND

While incarcerated in Arkansas, Hamilton, who was receiving dialysis and was subject to a fluid restriction, was placed in an isolation cell without air conditioning after a physical altercation with a guard. During approximately six weeks in isolation, outdoor temperatures reached as high as 95 degrees Fahrenheit, and Hamilton complained through multiple grievances that heat and his inability to replace lost fluids caused physical discomfort and endangered his health. Prison officials consulted a prison physician, who concluded that moving Hamilton was not an emergency, and officials implemented mitigation measures including portable air conditioners and open doors to an air-conditioned hallway. Hamilton continued receiving dialysis and treatment for other complaints, and he was eventually moved to the Special Needs Unit.

PROCEDURAL HISTORY

Hamilton sued prison officials under § 1983, alleging that placing him in a non-air-conditioned isolation cell for approximately six weeks despite his dialysis-related fluid restriction constituted cruel and unusual punishment. After discovery, the defendants moved for summary judgment. A magistrate judge recommended denying the motion, but the district court declined to adopt that recommendation, granted summary judgment to the defendants on qualified-immunity grounds, and denied Hamilton's motion for reconsideration. The Eighth Circuit affirmed.

DISPOSITION

affirmed

CASES CITED

- De Rossitte v. Correct Care Sols., LLC, 22 F.4th 796, 802-03 (8th Cir. 2022)
- Joseph v. Wheeler, 144 F.4th 1111, 1113 (8th Cir. 2025)
- Melton v. City of Forrest City, 147 F.4th 896, 901-02 (8th Cir. 2025)
- McDaniel v. Neal, 44 F.4th 1085, 1089 (8th Cir. 2022)
- Farmer v. Brennan, 511 U.S. 825, 832, 837 (1994)
- Wilson v. Seiter, 501 U.S. 294, 297, 303 (1991)
- Kulkay v. Roy, 847 F.3d 637, 642-43 (8th Cir. 2017)
- Schaub v. VonWald, 638 F.3d 905, 914 (8th Cir. 2011)
- Letterman v. Does, 789 F.3d 856, 862 (8th Cir. 2015)
- Reece v. Hale, 58 F.4th 1027, 1033 (8th Cir. 2023)
- McRaven v. Sanders, 577 F.3d 974 (8th Cir. 2009)

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