

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA, SOUTH BEND DIVISION

Tyler J. Arbuckle v. Warden

Arbuckle · No. 3:26-CV-137-PPS-JEM · Decided February 5, 2026

SUMMARY

The court grants Tyler J. Arbuckle leave to proceed against the Indiana State Prison Warden in the Warden’s official capacity on claims for protection from attack and constitutionally adequate mental health treatment under the Eighth Amendment. The court directs the clerk to docket the preliminary injunction motion as a complaint, seek waiver of service, and serve the Warden. The Warden is ordered to respond by February 23, 2026, describing the measures taken to protect Arbuckle and provide mental health treatment.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana, South Bend Division
WRITING FOR THE COURT	Philip P. Simon
JURISDICTION	United States District Court for the Northern District of Indiana, South Bend Division
DECIDED	February 5, 2026
DOCKET	3:26-CV-137-PPS-JEM
DISPOSITION	other
PROCEDURAL POSTURE	A pro se prisoner filed a motion for preliminary injunction alleging threats, self-harm, and constitutionally inadequate mental-health treatment. The district court screened the filing under 28 U.S.C. § 1915A, construed the motion as stating an official-capacity claim for injunctive relief, granted leave to proceed, separately docketed the motion as a complaint, and ordered the warden to respond.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915A, the court reviewed the merits of the prisoner filing and was required to dismiss it if frivolous, malicious, insufficient to state a claim, or seeking monetary relief from an immune defendant. For preliminary injunctive relief, the movant must establish likelihood of success on the merits, likely irreparable harm, a favorable balance of equities, and that an injunction is in the public interest.

TOPICS

injunctions

prisoners rights

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PRACTICE AREAS

prisoner civil rights

constitutional law

injunctive relief

civil procedure

mental health law

QUESTIONS PRESENTED

1. Whether Arbuckle's pro se preliminary-injunction filing stated an actionable official-capacity claim against the Indiana State Prison warden for permanent injunctive relief protecting him from attack and providing constitutionally adequate mental-health treatment.
2. What standard governs Arbuckle's request for a preliminary injunction.
3. Whether the Prison Litigation Reform Act permits the court to order a prison transfer without a clear showing of a constitutional violation and compliance with the statute's narrow-tailoring and least-intrusive-means requirements.
4. What service and responsive-pleading procedures should follow the screening determination.

HOLDINGS

1. The court granted Arbuckle leave to proceed against the Indiana State Prison warden in the warden's official capacity for permanent injunctive relief to protect Arbuckle from attack and provide constitutionally adequate mental-health treatment as required by the Eighth Amendment.
2. A preliminary injunction requires the movant to establish likelihood of success on the merits, likely irreparable harm absent relief, that the balance of equities favors the movant, and that an injunction is in the public interest.
3. The PLRA requires correctional injunctive relief to be narrowly drawn, extend no further than necessary to correct the federal-rights violation, and use the least intrusive means necessary; the court therefore recognized a high bar to ordering Arbuckle's transfer.

KEY QUOTATIONS

"A document filed pro se is to be liberally construed, and a pro se complaint, however inartfully pleaded, must be held to less stringent standards than formal pleadings drafted by lawyers." (at 94)

"A plaintiff seeking a preliminary injunction must establish that he is likely to succeed on the merits, that he is likely to suffer irreparable harm in the absence of preliminary relief, that the balance of equities tips in his favor, and that an injunction is in the public interest." (at 20)

FACTUAL BACKGROUND

Arbuckle alleged that he is chronically mentally ill, is harming himself, and has been placed on suicide watch, which he claims is worsening his mental health. He also alleged that fellow inmates and correctional guards threatened to kill him. He sought protection, constitutionally adequate mental-health treatment, and transfer to a different prison.

PROCEDURAL HISTORY

Tyler J. Arbuckle, proceeding without counsel, filed a preliminary-injunction motion in the district court. The court screened the filing under the Prison Litigation Reform Act, allowed an official-capacity claim against the Indiana State Prison warden for permanent injunctive relief, directed service by waiver, and ordered a response to the preliminary-injunction allegations by February 23, 2026. The court did not grant the requested transfer at this stage.

DISPOSITION

other

CASES CITED

- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Gonzalez v. Feinerman, 663 F.3d 311, 315 (7th Cir. 2011)
- Mazurek v. Armstrong, 520 U.S. 968, 972 (1997)
- Winter v. Natural Resources Defense Council, Inc., 555 U.S. 7, 20 (2008)
- Westefer v. Neal, 682 F.3d 679 (7th Cir. 2012)

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