

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

civil rights

constitutional law

service of process

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)

OPINION

SOUTH BEND DIVISION TYLER J. ARBUCKLE, Plaintiff, v. CAUSE NO. 3:26-CV-137-PPS-JEM WARDEN, Defendant. OPINION AND ORDER Tyler J. Arbuckle, a prisoner without a lawyer, filed a preliminary injunction motion alleging he is in danger at the Indiana State Prison. ECF 1. “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.” Erickson v. Pardus, 551 U.S. 89, 94 (2007) (quotation marks and citations omitted).

Nevertheless, under 28 U.S.C. § 1915A, I must review the merits of a prisoner complaint and dismiss it if the action is frivolous or malicious, fails to state a claim upon which relief may be granted, or seeks monetary relief against a defendant who is immune from such relief. Arbuckle says he is chronically mentally ill. He says he is harming himself and has been placed on suicide watch where his mental health is getting worse.

He alleges fellow inmates and guards threaten to kill him. The Indiana State Prison Warden has both the authority and the responsibility to ensure Arbuckle is protected from attack and provided constitutionally adequate mental health treatment as required by the Eighth Amendment. See

Gonzalez v. Feinerman, 663 F.3d 311, 315 (7th Cir. 2011). So, I will an official capacity claim against the Warden for permanent injunctive relief.

I will also require the Warden to respond to the preliminary injunction motion. Arbuckle asks to be transferred to a different prison. “[A] preliminary injunction is an extraordinary and drastic remedy, one that should not be granted unless the movant, by a clear showing, carries the burden of persuasion.” Mazurek v. Armstrong, 520 U.S. 968, 972 (1997). “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.” Winter v. Nat.

Res. Def. Council, Inc., 555 U.S. 7, 20 (2008). The PLRA circumscribes the scope of the court’s authority to enter an injunction in the corrections context. Where prison conditions are found to violate federal rights, remedial injunctive relief must be narrowly drawn, extend no further than necessary to correct the violation of the Federal right, and use the least intrusive means necessary to correct the violation of the Federal right.

This section of the PLRA enforces a point repeatedly made by the Supreme Court in cases challenging prison conditions: Prison officials have broad administrative and discretionary authority over the institutions they manage. Westefer v. Neal, 682 F.3d 679 (7th Cir. 2012) (cleaned up). It is unclear if Arbuckle’s constitutional rights are being violated, but even if I ultimately make such a finding, the PLRA places a high bar on my ordering his transfer.

That said, the Warden may decide to transfer Arbuckle even if his rights are not being violated. For these reasons, the court: (1) GRANTS Tyler J. Arbuckle leave to proceed against the Indiana State Prison Warden in his official capacity to obtain permanent injunctive relief to protect him from attack and provide him with constitutionally adequate mental health treatment as required by the Eighth Amendment; (2) DIRECTS the clerk to separately docket the preliminary injunction motion (ECF 1) as a complaint; (3) DIRECTS the clerk, under 28 U.S.C. § 1915(d), to request Waiver of Service from the Indiana State Prison Warden by emailing the Indiana Department of Correction with a copy of this order, and the motion/complaint (ECF 1); (4) DIRECTS the clerk to email a copy of the same documents to the Indiana State Prison Warden at the Indiana State Prison; (5) ORDERS the Indiana State Prison Warden to file and serve a response to the preliminary injunction, as soon as possible, but not later than February 23, 2026, (with supporting documentation and declarations from other staff as necessary) describing and explaining how Tyler J. Arbuckle is being protected and provided constitutionally adequate mental health treatment; and (6) ORDERS, under 42 U.S.C. § 1997e(g)(2), the Indiana State Prison Warden to respond, as provided in the Federal Rules of Civil Procedure and N.D.

Ind. L.R. 10-1(b), only to the claim for which the plaintiff has been granted leave to proceed in this screening order. ENTERED: February 5, 2026. /s/ Philip P. Simon PHILIP P. SIMON, JUDGE

UNITED STATES DISTRICT COURT

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