

UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

Robinson v. Johnson

343 F. App'x 778 (3d Cir. 2009) · Decided August 27, 2009

SUMMARY

The Third Circuit reversed a magistrate judge’s grant of summary judgment for prison officials in a prisoner’s 42 U.S.C. § 1983 action alleging failure to protect him from an assault. The court held that the prisoner had not procedurally defaulted his claims under the Prison Litigation Reform Act by failing to name the officials in his grievance, and alternatively concluded that the grievance process excused any such default.

CASE DETAILS

COURT	United States Court of Appeals for the Third Circuit
WRITING FOR THE COURT	Fisher, Circuit Judge; Fisher; Scirica; Sloviter
JURISDICTION	Federal
DECIDED	August 27, 2009
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Appeal from a Magistrate Judge's order granting summary judgment to prison officials in a 42 U.S.C. § 1983 failure-to-protect action.
STANDARD OF REVIEW	Plenary review of the grant of summary judgment, applying the same standard as the district court.
PRECEDENTIAL VALUE	published
PARTIES	Darrin Robinson v. Martin Horn, Phillip Johnson, Robert Onstott, Jeffrey Forte, Daniel E. Hooper, Joseph Essedy, Robert Onstott

TOPICS

- prisoners rights
- section 1983
- civil rights
- summary judgment
- appellate procedure

PRACTICE AREAS

- Civil rights
- Prisoner litigation
- Federal civil procedure
- Appellate procedure

QUESTIONS PRESENTED

1. Whether Robinson procedurally defaulted his § 1983 claims against Horn and Johnson under the PLRA by failing to identify them by name in his prison grievance.
2. Whether the prison grievance process nevertheless excused any procedural default because the grievance alerted prison officials to the problem and resulted in modification of the relevant yard procedures.

HOLDINGS

1. Robinson did not procedurally default his claims against Horn and Johnson merely by failing to identify them by name in his grievance because the record did not establish that their identities were facts relevant to the grievance or that identifying them as policymakers was practicable.
2. Even if Robinson had procedurally defaulted his claims by failing to name Horn and Johnson, the prison's grievance process excused the default because the grievance alerted prison officials to the problem and the review responses acknowledged that RHU yard procedures had been modified.

KEY QUOTATIONS

“ “[P]rison grievance procedures supply the yardstick’ for determining what steps are required for exhaustion [under § 1997e(a)]. ” ” (781)

“ “The primary purpose of a grievance is to alert prison officials to a problem, not to provide personal notice to a particular official that he may be sued. ” ” (782)

FACTUAL BACKGROUND

In June 2002, Robinson was an inmate in the Restricted Housing Unit at SCI-Pittsburgh. Pursuant to prison procedures, Officer Onstott placed Robinson, whose hands remained handcuffed behind his back, in an exercise cage with another inmate and removed the other inmate's handcuffs first. The other inmate then repeatedly stabbed Robinson with an improvised knife. Robinson's grievance described the incident, sought discipline and procedural changes, and requested compensation and medical care, but did not name Horn or Johnson.

PROCEDURAL HISTORY

Robinson, a Pennsylvania state prisoner, exhausted the three levels of Pennsylvania's Inmate Grievance System after being assaulted while handcuffed in an outdoor exercise cage. He then filed a § 1983 complaint alleging that prison officials failed to protect him in violation of the Eighth Amendment. The parties consented to adjudication by a Magistrate Judge, who granted summary judgment to all defendants, including Horn and Johnson on the ground that Robinson procedurally defaulted his claims by not naming them in his grievance. The Third Circuit reversed as to Horn and Johnson and remanded.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remanded to the Magistrate Judge for further proceedings consistent with the opinion.

CASES CITED

- Skretvedt v. E.I. DuPont de Nemours, 372 F.3d 193, 200 & n. 7 (3d Cir. 2004)
- Abrams v. Lightolier Inc., 50 F.3d 1204, 1209 n. 1 (3d Cir. 1995)
- Giles v. Kearney, 571 F.3d 318, 322 (3d Cir. 2009)
- Williams v. Beard, 482 F.3d 637, 639-40 (3d Cir. 2007)
- Conopco, Inc. v. United States, 572 F.3d 162, 165 (3d Cir. 2009)
- Woodford v. Ngo, 548 U.S. 81, 92-103 (2006)
- Spruill v. Gillis, 372 F.3d 218, 227-35 (3d Cir. 2004)
- Jones v. Bock, 549 U.S. 199, 218-19 (2007)

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