

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Adams v. Officer Gist, et al.

Adams · No. 3:24-cv-1535 · Decided January 20, 2026

SUMMARY

The United States District Court for the Middle District of Pennsylvania considers Defendant Officer Gist’s motion for summary judgment in a 42 U.S.C. § 1983 action arising from an alleged use of excessive force against inmate Joseph Adams. The court denies summary judgment on exhaustion grounds but concludes that the evidence does not support a reasonable finding that Gist used force maliciously or sadistically; the excerpt ends before the complete disposition is shown.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Robert D. Mariani
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	January 20, 2026
DOCKET	3:24-cv-1535
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff brought a 42 U.S.C. § 1983 action alleging excessive force and related state-law tort claims. Defendant Officer Gist moved for summary judgment under Federal Rule of Civil Procedure 56, asserting failure to exhaust administrative remedies, failure to establish an Eighth Amendment excessive-force claim, qualified immunity, and defenses to the state-law claims.
STANDARD OF REVIEW	Summary judgment is proper when there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The court viewed the evidence in the light most favorable to the nonmoving party, but treated the movant's factual statement as admitted under Local Rule 56.1 because Adams did not file a responsive statement. For qualified immunity, the court applied the two-pronged inquiry of whether a constitutional right was violated and whether the right was clearly established.
PRECEDENTIAL VALUE	unpublished

PARTIES

Joseph J. Adams v. Officer Gist, et al.

TOPICS

section 1983

prisoners rights

summary judgment

qualified immunity

civil rights

PRACTICE AREAS

civil rights

prisoner litigation

constitutional litigation

civil procedure

QUESTIONS PRESENTED

1. Whether Adams properly exhausted available administrative remedies against Officer Gist under the Prison Litigation Reform Act.
2. Whether the undisputed evidence established an Eighth Amendment excessive-force claim against Officer Gist.
3. Whether Officer Gist was entitled to qualified immunity from damages.
4. Whether the court should exercise supplemental jurisdiction over Adams's state-law negligence and assault-and-battery claims after disposing of the federal claim.

HOLDINGS

1. Adams's grievance and administrative appeals sufficiently alerted prison officials to the alleged excessive force by Officer Gist, so Gist was not entitled to summary judgment on the ground that Adams failed to exhaust administrative remedies.
2. Officer Gist was entitled to summary judgment on Adams's Eighth Amendment excessive-force claim because the evidence could not support a finding that Gist used force maliciously or sadistically to cause harm.
3. Officer Gist was entitled to qualified immunity from damages because the restrained conduct depicted in the video did not violate a clearly established constitutional right.
4. The court declined to exercise supplemental jurisdiction over Adams's state-law tort claims after dismissing the federal claims and dismissed those claims without prejudice.

KEY QUOTATIONS

“The Court will deny summary judgment based on failure to exhaust.” (15)

“It is clear on the record that Defendant Gist acted in a good faith effort to restore order and discipline.” (21)

“These state law claims therefore will be dismissed without prejudice, and Adams may refile his state law claims in the appropriate state court if he so chooses.” (25)

FACTUAL BACKGROUND

Adams, an inmate at SCI-Mahanoy, fought with another inmate in a prison day room on March 12, 2024. Officer Gist and other officers intervened, restrained Adams after he resisted, brought him to his feet, and later helped restrain him again when he pulled away during escort. The undisputed video evidence showed that Gist did not punch, kick, or otherwise strike Adams, and that he eventually stepped away while other officers secured Adams. Adams sustained an upper-lip laceration requiring stitches and complained of back and neck pain, but hospital testing showed no acute injury and his symptoms resolved.

PROCEDURAL HISTORY

Adams filed a prison grievance concerning the March 12, 2024 use-of-force incident and pursued it through final administrative review. He then commenced this federal civil-rights action. The court considered Gist's motion for summary judgment and granted it as to the federal excessive-force claim, denied it as to exhaustion, granted qualified immunity on the damages claim, and dismissed the remaining state-law claims without prejudice for lack of a basis to exercise supplemental jurisdiction.

DISPOSITION

other

CASES CITED

- Rau v. Allstate Fire & Casualty Insurance Co., 793 F. App'x 84, 87 (3d Cir. 2019)
- Weitzner v. Sanofi Pasteur Inc., 909 F.3d 604, 613 (3d Cir. 2018)
- Prater v. Department of Corrections, 76 F.4th 184, 204 (3d Cir. 2023)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248 (1986)
- Celotex Corp. v. Catrett, 477 U.S. 317, 323 (1986)
- Lujan v. National Wildlife Federation, 497 U.S. 871, 888 (1990)
- Big Apple BMW, Inc. v. BMW of North America, Inc., 974 F.2d 1358, 1363 (3d Cir. 1992)
- Scott v. Harris, 550 U.S. 372, 380 (2007)
- Paladino v. Newsome, 885 F.3d 203 (3d Cir. 2018)
- Small v. Camden County, 728 F.3d 265 (3d Cir. 2013)
- Ross v. Blake, 578 U.S. 632, 639, 642 (2016)
- Porter v. Nussle, 534 U.S. 516, 532 (2002)
- Williams v. Beard, 482 F.3d 637, 639 (3d Cir. 2007)
- Booth v. Churner, 532 U.S. 731, 741 (2001)
- Nyhuis v. Reno, 204 F.3d 65, 67, 73, 77-78 (3d Cir. 2000)
- Spruill v. Gillis, 372 F.3d 218, 227-32, 231, 234 (3d Cir. 2004)
- Camp v. Brennan, 219 F.3d 279 (3d Cir. 2000)
- Rinaldi v. United States, 904 F.3d 257, 266 (3d Cir. 2018)
- Woodford v. Ngo, 548 U.S. 81, 93 (2006)
- Downey v. Pennsylvania Department of Corrections, 968 F.3d 299, 305 (3d Cir. 2020)

- *Shifflett v. Korszniak*, 934 F.3d 356, 365 (3d Cir. 2019)
- *Hudson v. McMillian*, 503 U.S. 1, 7, 9 (1992)
- *Whitley v. Albers*, 475 U.S. 312, 319, 321, 327 (1986)
- *Wilkins v. Gaddy*, 559 U.S. 34, 37 (2010)
- *Flood v. Schaefer*, 439 F. App'x 179, 182 (3d Cir. 2011)
- *Brooks v. Kyler*, 204 F.3d 102, 106 (3d Cir. 2000)
- *Jones v. Wetzel*, 2017 WL 4284416, at *10 (M.D. Pa. Sept. 27, 2017)
- *Tindell v. Beard*, 351 F. App'x 591 (3d Cir. 2009)
- *Johnson v. City of Philadelphia*, 837 F.3d 343, 350 (3d Cir. 2016)
- *Graham v. Connor*, 490 U.S. 386, 396-97 (1989)
- *Williams v. Borough of West Chester, Pennsylvania*, 891 F.2d 458, 460 (3d Cir. 1989)
- *Wilson v. Layne*, 526 U.S. 603, 609 (1999)
- *Pearson v. Callahan*, 555 U.S. 223, 231, 244 (2009)
- *Malley v. Briggs*, 475 U.S. 335, 341 (1986)
- *Sharp v. Johnson*, 669 F.3d 144, 159 (3d Cir. 2012)
- *Giles v. Kearney*, 571 F.3d 318, 325-26 (3d Cir. 2009)
- *Saucier v. Katz*, 533 U.S. 194, 201 (2001)
- *Pearson v. Callahan*, 555 U.S. 223, 236 (2009)
- *Gilles v. Davis*, 427 F.3d 197, 207 (3d Cir. 2005)
- *Kopec v. Tate*, 361 F.3d 772, 777 (3d Cir. 2004)
- *United Mine Workers of America v. Gibbs*, 383 U.S. 715, 726 (1966)
- *Carnegie-Mellon University v. Cohill*, 484 U.S. 343, 350 n.7 (1988)
- *Hedges v. Musco*, 204 F.3d 109, 123 (3d Cir. 2000)