

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
ALABAMA, NORTHEASTERN DIVISION

Steven Keith Jones v. Alabama Department of Corrections, et al.

Jones · No. 5:24-cv-246-RDP-GMB · Decided January 23, 2026

SUMMARY

The United States District Court for the Northern District of Alabama overruled Steven Keith Jones’s objections to the Magistrate Judge’s Report and Recommendation. The court adopted the Report and Recommendation, construed Defendants’ special report as a motion for summary judgment, and granted summary judgment to the defendants. The court concluded that Jones had not properly presented or sought discovery concerning additional allegations and that his deliberate-indifference theory against Officer Chevelle Hunte failed on the merits.

CASE DETAILS

COURT	United States District Court for the Northern District of Alabama, Northeastern Division
WRITING FOR THE COURT	R. David Proctor
JURISDICTION	United States District Court for the Northern District of Alabama, Northeastern Division
DECIDED	January 23, 2026
DOCKET	5:24-cv-246-RDP-GMB
DISPOSITION	other
PROCEDURAL POSTURE	The court reviewed the plaintiff's objections to a magistrate judge's Report and Recommendation that defendants' special report be treated as a motion for summary judgment and that summary judgment be granted.
STANDARD OF REVIEW	The court reviewed the magistrate judge's Report and Recommendation and the plaintiff's specific objections, considering the challenged claims and the summary-judgment record.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion

TOPICS

- summary judgment
- discovery dispute
- prisoners rights
- section 1983
- civil procedure

PRACTICE AREAS

civil rights

prisoner litigation

constitutional torts

QUESTIONS PRESENTED

1. Whether the court properly construed defendants' special report as a motion for summary judgment.
2. Whether plaintiff was denied an opportunity to request discovery before summary judgment was considered.
3. Whether plaintiff's deliberate-indifference theory against Officer Hunte could survive summary judgment based on alleged authority to notify a supervisor of unsafe conditions.

HOLDINGS

1. Plaintiff's objection that he had no right or opportunity to request discovery was unfounded because the special-report order expressly allowed him to seek leave to conduct additional discovery, and he did not do so.
2. Plaintiff could not avoid summary judgment by asserting for the first time in his late reply additional factual allegations and theories that he had not included in the complaint or identified in response to the special-report order.
3. An assertion that Officer Hunte had authority to notify a shift commander of inadequate security did not establish the subjective awareness required for deliberate indifference; a defendant's failure to perceive a risk that she should have perceived does not, without more, constitute a constitutional violation.

KEY QUOTATIONS

"Subjective awareness of a substantial risk of harm requires more than proof that a defendant should have appreciated the risk."

"Plaintiff misunderstands the standard for deliberate indifference."

FACTUAL BACKGROUND

Plaintiff asserted failure-to-protect and wrongful-disciplinary-action claims against Officer Chevelle Hunte arising from an alleged lack of security at Limestone Correctional Facility. He later alleged that Hunte was aware of violence, dangerous conditions, overcrowding, and understaffing and failed to maintain adequate policies and practices to supervise housing units and common areas. The record contained no evidence that Hunte was a supervisor or possessed policymaking authority, and plaintiff did not seek additional discovery through the procedure provided by the special-report order.

PROCEDURAL HISTORY

The magistrate judge issued a Report and Recommendation on November 3, 2025, recommending that the defendants' special report be construed as a motion for summary judgment and granted. Plaintiff filed objections on November 17, 2025, arguing that summary judgment was premature because he needed discovery and asserting additional allegations. The district court overruled the objections, adopted the Report and

Recommendation, accepted the recommendation, and ordered that summary judgment be granted; final judgment was to follow.

DISPOSITION

other

CASES CITED

- Houston v. Lack, 487 U.S. 266, 275-76 (1988)
- Goodman v. Kimbrough, 718 F.3d 1325, 1334 (11th Cir. 2013)
- Farmer v. Brennan, 511 U.S. 825, 838 (1994)

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