

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA

Stephen Barry Gibbons v. Sabanda

Gibbons v. Sabanda · No. Civil No. 21-1210 · Decided April 27, 2026

SUMMARY

The United States District Court for the Western District of Pennsylvania overruled Stephen Barry Gibbons’s objections to a magistrate judge’s Report and Recommendation. The court adopted the recommendation, denied Gibbons’s motion for summary judgment, and granted Defendant Sabanda’s motion for summary judgment in claims concerning religious exercise, the Religious Freedom Restoration Act, and processing of a religious-preference change.

CASE DETAILS

COURT	United States District Court for the Western District of Pennsylvania
WRITING FOR THE COURT	Marilyn J. Horan
JURISDICTION	United States District Court for the Western District of Pennsylvania
DECIDED	April 27, 2026
DOCKET	Civil No. 21-1210
DISPOSITION	other
PROCEDURAL POSTURE	The district court conducted de novo review of a magistrate judge's Report and Recommendation after timely objections and resolved cross-motions for summary judgment.
STANDARD OF REVIEW	The district court reviewed the objected-to portions of the Report and Recommendation de novo under 28 U.S.C. § 636(b)(1) and Federal Rule of Civil Procedure 72(b)(3). Summary judgment was appropriate because there was no genuine dispute of material fact and Sabanda was entitled to judgment as a matter of law.
PRECEDENTIAL VALUE	unknown
PARTIES	Stephen Barry Gibbons v. Sabanda

TOPICS

- summary judgment
- free exercise clause
- civil rights
- civil procedure

PRACTICE AREAS

civil procedure

civil rights

constitutional law

prisoner litigation

QUESTIONS PRESENTED

1. Whether the district court should reject the magistrate judge's recommendation after de novo review of Gibbons's objections.
2. Whether the Religious Freedom Restoration Act applies to state and local governments.
3. Whether Sabanda could be held legally responsible for Gibbons's change in religious preference when Sabanda lacked personal involvement in the change.
4. Whether the undisputed facts established that Sabanda did not unduly burden Gibbons's exercise of religion and was entitled to summary judgment.

HOLDINGS

1. Timely objections require the district court to conduct a de novo determination of the portions of the magistrate judge's Report and Recommendation to which objection is made; after conducting that review, the court overruled Gibbons's objections and adopted the recommendation.
2. The Religious Freedom Restoration Act does not apply to state and local governments.
3. Sabanda could not be held legally responsible for Gibbons's change in religious preference because Sabanda was not personally involved in the conduct that caused the change.
4. Summary judgment for Sabanda was appropriate because the undisputed facts showed that Sabanda did not unduly burden Gibbons's religious practice and processed the religious-preference request within the thirty-day period required by DOC policy.

KEY QUOTATIONS

“The filing of timely objections requires the district judge to “make a de novo determination of those portions of the report . . . to which objection is made.””

FACTUAL BACKGROUND

Gibbons, an inmate, sought to change his religious preference from Muslim to none and alleged that Sabanda, a corrections employee, delayed processing the change so that Gibbons could not participate in Ramadan. Sabanda received Gibbons's request for a religious-preference form on April 7, 2020, provided the form on April 10, and received the completed form on April 14. The change was recorded in the Department of Corrections system on April 27, 2020, four days after Ramadan began and within the thirty-day processing period established by DOC policy; Sabanda was employed at SCI-Greene while the religious-preference change occurred at SCI-Forest.

PROCEDURAL HISTORY

The case was referred to Magistrate Judge Maureen P. Kelly for pretrial proceedings. The magistrate judge recommended granting Sabanda's motion for summary judgment and denying Gibbons's motion. After several

extensions, Gibbons timely objected, and the district court conducted de novo review, overruled the objections, adopted the Report and Recommendation, denied Gibbons's motion, and granted Sabanda's motion.

DISPOSITION

other

CASES CITED

- Sample v. Diecks, 885 F.2d 1099, 1106 n. 3 (3d Cir. 1989)

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