

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Alkein Coates v. Sgt. Aladekere, et al.

Coates · No. PX-24-2022 · Decided March 3, 2026

SUMMARY

The United States District Court for the District of Maryland grants defendants’ motion to dismiss most claims brought by incarcerated plaintiff Alkein Coates under 42 U.S.C. § 1983. The court dismisses claims concerning prison conditions, alleged excessive force, grievance procedures, supervisory liability, and property deprivation, concluding that the complaint lacks sufficient factual allegations or that adequate remedies exist. The court permits Coates one opportunity to file a second amended complaint limited to his involuntary-medication claim against Ms. Sarah and an unnamed medical doctor.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Paula Xinis
JURISDICTION	United States District Court for the District of Maryland
DECIDED	March 3, 2026
DOCKET	PX-24-2022
DISPOSITION	granted in part and denied in part
PROCEDURAL POSTURE	Defendants moved to dismiss the pro se prisoner's amended civil-rights complaint under Federal Rule of Civil Procedure 12(b)(6). The court granted the motion as to all defendants except Ms. Sarah and the Unnamed Medical Doctor, as to whom plaintiff was granted leave to file a second amended complaint limited to an involuntary-medication claim.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded allegations as true and views them most favorably to the plaintiff, but disregards conclusory statements and formulaic recitations of the elements. The complaint must allege enough facts to raise a right to relief above the speculative level and make entitlement to relief plausible.
PRECEDENTIAL VALUE	District court memorandum opinion; precedential status not stated
PARTIES	Alkein Coates v. Sgt. Adetayo Aladekere, Assistant Warden Kimberly Stewart, Officers Okechukwu Chima and Sia Kaimachiande, Sergeants

TOPICS

section 1983 prisoners rights motions to dismiss cruel and unusual punishment due process

PRACTICE AREAS

prisoner civil rights constitutional litigation civil procedure Section 1983 litigation

QUESTIONS PRESENTED

1. Whether the amended complaint plausibly alleged supervisory liability under 42 U.S.C. § 1983.
2. Whether the allegations concerning restricted movement, denial of water and visitation, and alleged conspiracy stated an Eighth Amendment conditions-of-confinement claim.
3. Whether allegations that an officer pulled plaintiff's cuffed arm and that transit officers kept him restrained stated an Eighth Amendment excessive-force claim.
4. Whether restrictions on prison grievances and the alleged denial of witnesses at a disciplinary proceeding stated a Fourteenth Amendment due-process claim.
5. Whether alleged loss or deprivation of personal property stated a due-process claim.
6. Whether the allegations concerning involuntary psychiatric medication plausibly stated a constitutional claim warranting leave to amend.

HOLDINGS

1. A supervisor cannot be held liable under § 1983 merely because a subordinate allegedly violated the plaintiff's constitutional rights; the complaint must plausibly allege the supervisor's personal participation or deliberate indifference to, or tacit authorization of, the subordinate's unconstitutional conduct. Coates's conclusory supervisory allegations did not satisfy that standard.
2. Allegations that Sergeant Aladekere restricted Coates's movement and access to water for brief periods did not plausibly establish deliberate indifference to a substantial risk of serious harm.
3. Allegations that Officer Chima pulled Coates's cuffed arm and that transit officers kept him in a three-piece restraint did not plausibly state an excessive-force claim because the complaint did not provide facts showing that the force or restraints were excessive, unnecessary, or used maliciously and sadistically to cause harm.
4. Coates did not state a due-process claim based on the alleged denial of witnesses at a disciplinary hearing or limitation and inadequate investigation of grievances. Prison officials retain discretion to limit witnesses for legitimate institutional reasons, and the alleged grievance restrictions were permissible under the cited Maryland regulation.
5. Coates's allegations concerning the loss or deprivation of personal property did not state a due-process claim because negligent deprivation is not actionable under the Due Process Clause and intentional

deprivation is not actionable where an adequate post-deprivation state remedy is available.

6. The allegations that medical providers misrepresented the purpose of psychiatric medication, caused Coates to take it, and refused to stop it after he objected plausibly stated a constitutional claim for involuntary medication. The court therefore allowed one opportunity to file a second amended complaint limited to that claim.

KEY QUOTATIONS

“No Defendant may be liable as a supervisor simply because the supervisee deprived the plaintiff of his constitutional rights.” (Discussion § III.A)

“Without additional facts to make plausible that such restraints were unnecessary, excessive, and applied with the requisite intentionality, the claim must fail.” (Discussion § III.C)

“The Amended Complaint is dismissed against all Defendants except for Ms. Sarah and the Unnamed Medical Doctor.” (Conclusion)

FACTUAL BACKGROUND

Alkein Coates, an inmate at Patuxent Institution, alleged that prison officials harassed him, restricted his movement and access to water and visitation, used excessive force, mishandled or lost his property, limited or failed to investigate grievances, and denied him witnesses in a disciplinary matter. He also alleged that medical personnel misrepresented the purpose of psychiatric medication, caused him to take it, and refused to stop the medication after he objected. The complaint generally attributed deplorable prison conditions and discriminatory treatment to supervisory officials without alleging specific acts or omissions connecting those officials to a constitutional deprivation.

PROCEDURAL HISTORY

Coates filed suit on July 11, 2024, and later amended and supplemented his complaint twice with leave of court. He also filed unauthorized supplements, which the court declined to construe as part of the complaint, although it reviewed them and found no facts that would save the claims against the additional defendants. Defendants moved to dismiss, and the court resolved the motion without a hearing under Local Rule 105.6.

DISPOSITION

granted in part and denied in part

REMAND INSTRUCTIONS

No remand. Coates may file one second amended complaint limited to the involuntary-medication claim against Ms. Sarah and the Unnamed Medical Doctor. No supplements may be filed absent a well-supported motion for leave, and any permitted supplement must relate only to that claim.

CASES CITED

- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555 (2007)

- E.E.O.C. v. Performance Food Grp., Inc., 16 F. Supp. 3d 584, 588 (D. Md.)
- Francis v. Giacomelli, 588 F.3d 186, 193 (4th Cir.)
- Hughes v. Rowe, 449 U.S. 5, 9
- Weller v. Dep't of Soc. Servs. for City of Baltimore, 901 F.2d 387, 391 (4th Cir.)
- Ashcroft v. Iqbal, 556 U.S. 662, 665
- Trulock v. Freeh, 275 F.3d 391, 402 (4th Cir.)
- Love-Lane v. Martin, 355 F.3d 766, 782 (4th Cir.)
- Shaw v. Stroud, 13 F.3d 791, 799 (4th Cir.)
- Pennhurst State Sch. & Hosp. v. Halderman, 465 U.S. 89, 100
- Will v. Michigan Dep't of State Police, 491 U.S. 58, 70-71
- Gregg v. Georgia, 428 U.S. 153, 173
- Estelle v. Gamble, 429 U.S. 97, 102
- Williams v. Benjamin, 77 F.3d 756, 761 (4th Cir.)
- Farmer v. Brennan, 511 U.S. 825, 834, 837-38
- Wilson v. Seiter, 501 U.S. 294, 303
- Thompson v. Commonwealth of Virginia, 878 F.3d 89, 97-98 (4th Cir.)
- Shakka v. Smith, 71 F.3d 162, 166 (4th Cir.)
- Brown v. N. Carolina Dep't of Corr., 612 F.3d 720, 723 (4th Cir.)
- Case v. Ahitow, 301 F.3d 605, 607 (7th Cir.)
- Hudson v. McMillian, 503 U.S. 1, 6-7
- Iko v. Shreve, 535 F.3d 225, 238 (4th Cir.)
- Wolff v. McDonnell, 418 U.S. 539, 563-66
- Daniels v. Williams, 474 U.S. 327, 335-36
- Hudson v. Palmer, 468 U.S. 517, 533
- Tydings v. Dep't of Corr., 714 F.2d 11, 12 (4th Cir.)
- Juncker v. Tinney, 549 F. Supp. 574, 579 (D. Md.)