

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF  
INDIANA, SOUTH BEND DIVISION

Zachary Taylor Ingram v. Bradford, et al.

Ingram · No. 3:25-CV-72-CCB-SJF · Decided April 29, 2026

SUMMARY

The United States District Court for the Northern District of Indiana granted the defendants’ motion for summary judgment in Zachary Taylor Ingram’s Eighth Amendment excessive-force action. The court held that Ingram failed to exhaust available administrative remedies before filing suit under the Prison Litigation Reform Act and had not shown that the grievance process was unavailable. The court directed the clerk to enter judgment for the defendants and close the case.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Northern District of Indiana, South Bend Division                                                                                                                                                                                                                                                                                                                                               |
| WRITING FOR THE COURT | Cristal C. Brisco                                                                                                                                                                                                                                                                                                                                                                                                                    |
| JURISDICTION          | United States District Court for the Northern District of Indiana, South Bend Division                                                                                                                                                                                                                                                                                                                                               |
| DECIDED               | April 29, 2026                                                                                                                                                                                                                                                                                                                                                                                                                       |
| DOCKET                | 3:25-CV-72-CCB-SJF                                                                                                                                                                                                                                                                                                                                                                                                                   |
| DISPOSITION           | other                                                                                                                                                                                                                                                                                                                                                                                                                                |
| PROCEDURAL POSTURE    | In a prisoner civil-rights action alleging excessive force in violation of the Eighth Amendment, defendants moved for summary judgment based on failure to exhaust available administrative remedies. The plaintiff filed no opposition, and the court granted summary judgment for defendants.                                                                                                                                      |
| STANDARD OF REVIEW    | Summary judgment is required 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 construes facts and reasonable inferences in favor of the nonmoving party, but an opposing party must identify evidence supporting its position rather than rely on allegations or denials. On exhaustion, defendants bear the burden of proving the affirmative defense. |
| PRECEDENTIAL VALUE    | nonprecedential district court opinion                                                                                                                                                                                                                                                                                                                                                                                               |

## TOPICS

summary judgment

prisoners rights

civil rights

civil procedure

affirmative defenses

## PRACTICE AREAS

prisoner civil rights

federal civil procedure

summary judgment

## QUESTIONS PRESENTED

1. Whether defendants were entitled to summary judgment because Ingram failed to exhaust available administrative remedies before filing his prisoner-conditions action.
2. Whether post-filing attempts to pursue the prison grievance process could satisfy the exhaustion requirement.

## HOLDINGS

1. Defendants were entitled to summary judgment because the undisputed evidence showed that the grievance process was available to Ingram and that he did not complete it, or submit any relevant grievance, before filing suit.
2. Post-filing attempts to submit grievances did not satisfy the exhaustion requirement and were irrelevant to whether Ingram exhausted administrative remedies before filing suit.

## KEY QUOTATIONS

*“Summary judgment must be granted when “there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law.””* (Opinion and Order text)

*“The fact that Ingram attempted to submit relevant grievances after he filed this lawsuit is not relevant to the exhaustion analysis.”* (Opinion and Order text)

## FACTUAL BACKGROUND

Ingram, an Indiana prisoner, alleged that Sgt. Brett Laurie, Sgt. Smith, and Lt. Bradford used excessive force against him at Westville Correctional Facility on June 3, 2024. The facility's grievance process was available to Ingram and required a formal grievance, a Level I appeal to the warden, and a Level II appeal to the Department Grievance Manager. Although Ingram had successfully submitted grievances in the past, he submitted no grievance concerning the alleged excessive force before filing this lawsuit; grievances submitted afterward were rejected as untimely.

## PROCEDURAL HISTORY

Zachary Taylor Ingram filed suit against correctional officers seeking compensatory and punitive damages for alleged excessive force on June 3, 2024. Defendants moved for summary judgment on November 25, 2025, asserting that Ingram had not exhausted the prison grievance process before filing suit. After the court extended Ingram's response deadline and he still filed no response, the court granted the motion, directed entry of judgment for defendants, and ordered the case closed.

## DISPOSITION

other

## CASES CITED

- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248 (1986)
- Heft v. Moore, 351 F.3d 278, 282 (7th Cir. 2003)
- Goodman v. National Security Agency, Inc., 621 F.3d 651, 654 (7th Cir. 2010)
- Perez v. Wisconsin Department of Corrections, 182 F.3d 532, 535 (7th Cir. 1999)
- King v. McCarty, 781 F.3d 889, 893 (7th Cir. 2015)
- Lockett v. Bonson, 937 F.3d 1016, 1025 (7th Cir. 2019)
- Mayberry v. Schlarf, No. 3:23-CV-64-JD-JEM, 2024 WL 4274856, at \*3 (N.D. Ind. Sept. 24, 2024)
- Ford v. Johnson, 362 F.3d 395, 398 (7th Cir. 2004)

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