

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF CONNECTICUT

Ian Wright v. Angel Quiros, et al.

Wright · No. No. 3:23-cv-949 (SRU) · Decided June 8, 2026

SUMMARY

The United States District Court for the District of Connecticut denied Ian Wright’s renewed motion for relief from judgment under Federal Rule of Civil Procedure 60(b)(1) and (6). The court reaffirmed its prior grant of summary judgment for the defendants on Wright’s Eighth Amendment claims, concluding that no reasonable jury could find deliberate indifference and that qualified immunity applied. The court noted that Wright could continue pursuing relief through his pending appeal to the Second Circuit.

CASE DETAILS

COURT	United States District Court for the District of Connecticut
WRITING FOR THE COURT	Stefan R. Underhill
JURISDICTION	United States District Court for the District of Connecticut
DECIDED	June 8, 2026
DOCKET	No. 3:23-cv-949 (SRU)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved under Federal Rule of Civil Procedure 60(b)(1) and (6) for relief from a final judgment granting defendants summary judgment. The district court denied the renewed motion.
STANDARD OF REVIEW	Relief under Rule 60(b)(1) requires a qualifying mistake, inadvertence, surprise, or excusable neglect; relief under Rule 60(b)(6) requires extraordinary circumstances and grounds not encompassed by Rule 60(b)(1)-(5).
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	Ian Wright v. Angel Quiros, et al.

TOPICS

- motion for reconsideration
- qualified immunity
- prisoners rights
- section 1983
- summary judgment

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Wright demonstrated a mistake, inadvertence, surprise, or excusable neglect warranting relief from judgment under Federal Rule of Civil Procedure 60(b)(1).
2. Whether Wright demonstrated extraordinary circumstances and a ground not covered by Rule 60(b)(1)-(5) warranting relief under Rule 60(b)(6).
3. Whether the court's prior determination that defendants were entitled to summary judgment on the Eighth Amendment claims and qualified immunity was erroneous.

HOLDINGS

1. Wright was not entitled to relief under Rule 60(b)(1) because the court did not make a qualifying mistake in its prior analysis of his Eighth Amendment claims.
2. Wright was not entitled to relief under Rule 60(b)(6) because he did not demonstrate extraordinary circumstances and his asserted grounds were addressed by Rule 60(b)(1).
3. Defendants were protected by qualified immunity because it was objectively reasonable, particularly in light of the lack of contrary precedent, for them to believe that their conduct did not violate the Eighth Amendment.

KEY QUOTATIONS

"I did not make a "mistake" under Rule 60(b)(1), and there are not "extraordinary circumstances" warranting relief under Rule 60(b)(6)." (at 3)

"Furthermore, in the absence of any argument to the contrary by Wright, I reiterate that the doctrine of qualified immunity shields the Defendants, because it was objectively reasonable, especially considering the lack of precedent to the contrary, for each of the Defendants to believe that their conduct did not violate the Eighth Amendment." (at 3)

FACTUAL BACKGROUND

Wright, a Connecticut prisoner housed at Osborn Correctional Institution, alleged that DOC District Administrator Rodriguez, Osborn Warden Guadarrama, and Food Service Supervisor Wilcox violated the Eighth Amendment through their handling of his exposure to COVID-19. He also asserted a Connecticut state-law recklessness claim. The court previously determined that no reasonable jury could find deliberate indifference by any defendant and that qualified immunity applied.

PROCEDURAL HISTORY

Wright brought a 42 U.S.C. § 1983 action alleging that prison officials violated the Eighth Amendment by exposing him to COVID-19 and asserting a state-law recklessness claim. The court granted defendants' motion for summary judgment, entered judgment for defendants, and declined supplemental jurisdiction over the state-law claim. Wright's untimely Rule 59(e) motion was construed as a Rule 60(b) motion; after an appeal was filed

and stayed, he renewed the Rule 60(b) motion. The court denied the renewed motion, concluding that Wright had shown neither a Rule 60(b)(1) mistake nor extraordinary circumstances under Rule 60(b)(6).

DISPOSITION

other

CASES CITED

- Banister v. Davis, 590 U.S. 504, 507-08 (2020)
- Triestman v. Federal Bureau of Prisons, 470 F.3d 471, 476
- Kemp v. United States, 596 U.S. 528, 532 (2022)
- BLOM Bank SAL v. Honickman, 605 U.S. 204, 215 (2025)