

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE, NASHVILLE DIVISION

Randolph Bradley Jr. v. Rudd Medical Services, et al.

Bradley v. Rudd Medical Services · No. 3:24-cv-00827 · Decided April 7, 2026

SUMMARY

The United States District Court for the Middle District of Tennessee grants Randolph Bradley Jr.’s motion to file a second amended complaint and conducts screening under the Prison Litigation Reform Act. The court allows Eighth Amendment deliberate-indifference claims to proceed against Charles Flynn, Tammy Lovejoy, and John Rudd, but dismisses the claim against Rudd Medical Services for failure to allege a basis for municipal liability. The court also denies or resolves the plaintiff’s other motions and directs service-related procedures.

CASE DETAILS

COURT	United States District Court for the Middle District of Tennessee, Nashville Division
WRITING FOR THE COURT	Aleta A. Trauger
JURISDICTION	United States District Court for the Middle District of Tennessee, Nashville Division
DECIDED	April 7, 2026
DOCKET	3:24-cv-00827
DISPOSITION	other
PROCEDURAL POSTURE	Pro se prisoner civil-rights action screened under the Prison Litigation Reform Act after the court granted leave to file a second amended complaint.
STANDARD OF REVIEW	At PLRA screening, the court must dismiss claims that are frivolous, fail to state a claim upon which relief may be granted, or seek monetary relief from an immune defendant. Pro se pleadings are liberally construed, and factual allegations are accepted as true unless entirely lacking credibility.
PRECEDENTIAL VALUE	unpublished
PARTIES	Randolph Bradley Jr. v. Rudd Medical Services, Charles Flynn, Tammy Lovejoy, John Rudd

TOPICS

section 1983 prisoners rights civil rights motion to amend civil procedure

PRACTICE AREAS

civil rights prisoner civil rights constitutional law health law

QUESTIONS PRESENTED

1. Whether the second amended complaint stated an Eighth Amendment deliberate-indifference claim against the individual defendants.
2. Whether the complaint stated a claim for municipal liability under 42 U.S.C. § 1983 against Rudd Medical Services.
3. Whether the plaintiff should be granted leave to amend and appointed counsel.

HOLDINGS

1. The complaint plausibly stated Eighth Amendment deliberate-indifference claims against Charles Flynn, Tammy Lovejoy, and John Rudd because chronic urine leakage and significant pain during bowel movements could be recognized by a layperson as medical conditions requiring treatment, and the allegations supported an inference that the defendants knew of and consciously disregarded those conditions.
2. The claim against Rudd Medical Services failed because the complaint did not allege that an organizational policy, statement, regulation, decision, or custom caused the alleged constitutional injury.
3. The court granted the most recent motion for leave to amend, denied the prior amendment motion as moot, denied the motion for appointed counsel without prejudice, and denied the motion for a magistrate judge as unnecessary.

KEY QUOTATIONS

“To state an Eighth Amendment claim based on deliberate indifference to a serious medical need, a plaintiff must allege facts that would allow the court to find (1) “either that a doctor has diagnosed them with a condition requiring treatment or that they suffer from a condition that any layperson would recognize requires treatment” and (2) that the defendant “subjectively knew of (and consciously disregarded) the serious medical needs.””

FACTUAL BACKGROUND

Bradley, who was incarcerated at the Rutherford County Jail, alleged chronic urine leakage beginning in August 2023 and requested adult briefs that were not provided. He also alleged pain, swelling, tenderness, bruising, and a sensation that his anal tissue was turning inside out during and after bowel movements. Charles Flynn diagnosed him with external hemorrhoids in December 2024, and Bradley alleged that Flynn, Tammy Lovejoy, and John Rudd knew of his symptoms, failed to provide treatment, and refused to send him to an outside specialist. He did not allege that an organizational policy or custom of Rudd Medical Services caused the alleged constitutional injury.

PROCEDURAL HISTORY

Bradley filed a civil-rights complaint and then moved twice to amend. The court granted the second motion to amend, treated the second amended complaint as operative, and screened it under 28 U.S.C. §§ 1915(e)(2) and 1915A. The court allowed the Eighth Amendment deliberate-indifference claims against the individual defendants to proceed but dismissed the claim against Rudd Medical Services for failure to allege a policy or custom supporting municipal liability.

DISPOSITION

other

CASES CITED

- Lanier v. Bryant, 332 F.3d 999, 1006 (6th Cir. 2003)
- United States v. Smotherman, 838 F.3d 736, 739 (6th Cir. 2016)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Thomas v. Eby, 481 F.3d 434, 437 (6th Cir. 2007)
- Denton v. Hernandez, 504 U.S. 25, 33 (1992)
- Haines v. Kerner, 404 U.S. 519, 520-21 (1972)
- Jourdan v. Jabe, 951 F.2d 108, 110 (6th Cir. 1991)
- McDonald v. Hall, 610 F.2d 16, 19 (1st Cir. 1979)
- Erickson v. Gogebic County, Michigan, 133 F.4th 703, 711-12 (6th Cir. 2025)
- Warnell v. Mount St. Joseph University, 144 F.4th 880, 891 n.4 (6th Cir. 2025)
- Monell v. Department of Social Services, 436 U.S. 658, 690-91 (1978)