

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH,
CENTRAL DIVISION

Gary Eatchel v. Jennifer Stansfield, et al.

Eatchel · No. 2:25-cv-197 · Decided December 23, 2025

SUMMARY

The United States District Court for the District of Utah screened Gary Eatchel’s pro se 42 U.S.C. § 1983 complaint and identified deficiencies concerning personal participation, equal protection, due process, retaliation, failure to protect, grievances, and access to legal assistance. The court ordered him to file an amended complaint within ninety days and denied his motion for appointed counsel without prejudice. The court warned that failure to cure the deficiencies could result in dismissal without further notice.

CASE DETAILS

COURT	United States District Court for the District of Utah, Central Division
WRITING FOR THE COURT	Tena Campbell
JURISDICTION	United States District Court for the District of Utah, Central Division
DECIDED	December 23, 2025
DOCKET	2:25-cv-197
DISPOSITION	other
PROCEDURAL POSTURE	A self-represented prisoner brought a civil-rights action under 42 U.S.C. § 1983. After screening the complaint under 28 U.S.C. § 1915A, the court ordered Plaintiff to file an amended complaint curing identified deficiencies and denied without prejudice his motion for appointed counsel.
STANDARD OF REVIEW	Screening under 28 U.S.C. § 1915A for frivolousness, failure to state a claim, and claims seeking monetary relief from immune defendants.
PRECEDENTIAL VALUE	unpublished district court memorandum decision and order
PARTIES	Gary Eatchel v. Jennifer Stansfield, et al.

TOPICS

- pleadings
- section 1983
- prisoners rights
- civil procedure
- due process

PRACTICE AREAS

civil procedure

prisoner civil rights

constitutional law

pleading

appointed counsel

QUESTIONS PRESENTED

1. Whether the complaint satisfied the pleading and personal-participation requirements applicable to a prisoner's § 1983 action.
2. Whether the complaint adequately stated potential equal protection, due process, retaliation, and failure-to-protect claims.
3. Whether Plaintiff was entitled to appointed counsel in the civil action.

HOLDINGS

1. The complaint was deficient because it did not affirmatively link specific alleged civil-rights violations to specific defendants or identify what each defendant personally did.
2. Alleged violations of prison policy, state statutes or codes, promises, or ethics rules do not, without more, establish a violation of the federal Constitution.
3. The complaint was deficient because it did not link the elements of the asserted equal protection, due process, retaliation, and failure-to-protect theories to specific named defendants and supporting facts.
4. A prisoner has no independent constitutional right to a state administrative grievance procedure, and denial or mishandling of a grievance alone does not establish personal participation in an underlying constitutional violation.
5. The motion for appointed counsel was denied without prejudice because Plaintiff's claims were not then shown to be colorable, the issues were not complex, and Plaintiff appeared capable of litigating the matter.

KEY QUOTATIONS

"Each defendant must be named in the complaint's caption, listed in the section of the complaint setting forth the names of each defendant, and affirmatively linked to applicable claims within the "cause of action" section of the complaint."

"A plaintiff who brings a constitutional claim under § 1983 can't obtain relief without first satisfying the personal participation requirement"

"To prevail on a failure to protect claim, an inmate must show (1) that the conditions of his incarceration present[ed] an objective substantial risk of serious harm and (2) prison officials had subjective knowledge of the risk of harm."

"There is no independent constitutional right to state administrative grievance procedures."

FACTUAL BACKGROUND

Gary Eatchel, an inmate at the Utah State Correctional Facility, filed a pro se § 1983 complaint against Jennifer Stansfield and other defendants. The complaint apparently relied on alleged violations of promises, prison

policies, state law, ethics rules, grievances, and several asserted constitutional theories, including equal protection, due process, retaliation, and failure to protect. The court found that the pleading did not adequately identify what each defendant did or connect each defendant to the elements of the asserted claims.

PROCEDURAL HISTORY

Plaintiff filed a complaint and a motion for appointed counsel. The district court screened the complaint under the Prison Litigation Reform Act and concluded that the pleading did not adequately link alleged constitutional violations to specific defendants or sufficiently state several potential constitutional claims. The court allowed ninety days to file an amended complaint, warned that failure to cure would result in dismissal, and denied the request for counsel without prejudice.

DISPOSITION

other

CASES CITED

- Williams v. Miller, 696 F. App'x 862, 870 (10th Cir. 2017)
- Porro v. Barnes, 624 F.3d 1322, 1329 (10th Cir. 2010)
- Hostetler v. Green, 323 F. App'x 653, 657–58 (10th Cir. 2009)
- Hovater v. Robinson, 1 F.3d 1063, 1068 n.4 (10th Cir. 1993)
- Hale v. Federal Bureau of Prisons, 759 F. App'x 741, 752 (10th Cir. 2019)
- Cleveland Board of Education v. Loudermill, 470 U.S. 532, 542 (1985)
- Gallagher v. Shelton, 587 F.3d 1063, 1069 (10th Cir. 2009)
- Boyd v. Werholtz, 443 F. App'x 331, 332 (10th Cir. 2011)
- Dixon v. Bishop, No. CV TDC-19-740, 2020 U.S. Dist. LEXIS 41678, at *20 (D. Md. Mar. 11, 2020)
- Lewis v. Casey, 518 U.S. 343, 356 (1996)
- Bounds v. Smith, 430 U.S. 817, 828 (1977)
- TV Communications Network, Inc. v. ESPN, Inc., 767 F. Supp. 1062, 1069 (D. Colo. 1991)
- Hall v. Bellmon, 935 F.2d 1106, 1110 (10th Cir. 1991)
- Dunn v. White, 880 F.2d 1188, 1197 (10th Cir. 1989)
- Murray v. Archambo, 132 F.3d 609, 612 (10th Cir. 1997)
- Bennett v. Passic, 545 F.2d 1260, 1262–63 (10th Cir. 1976)
- Stone v. Albert, 338 F. App'x 757, 759 (10th Cir. 2009)
- Robbins v. Oklahoma, 519 F.3d 1242, 1248, 1250 (10th Cir. 2008)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 565 n.10 (2007)
- Mitchell v. Maynard, 80 F.3d 1433, 1441 (10th Cir. 1996)
- Jones v. Bock, 549 U.S. 199, 216 (2007)
- Vasquez v. Davis, 882 F.3d 1270, 1275 (10th Cir. 2018)

- *Pahls v. Thomas*, 718 F.3d 1210, 1225 (10th Cir. 2013)
- *Tonkovich v. Kansas Board of Regents*, 159 F.3d 504, 532–33 (10th Cir. 1998)
- *Estate of Roemer v. Johnson*, 764 F. App'x 784, 790–91 & n.5 (10th Cir. 2019)
- *Shero v. City of Grove*, 510 F.3d 1196, 1203 (10th Cir. 2007)
- *Farmer v. Brennan*, 511 U.S. 825, 832–34, 837 (1994)
- *Requena v. Roberts*, 893 F.3d 1195, 1214 (10th Cir. 2018)
- *Pittman v. Kahn*, No. 23-1153, 2024 U.S. App. LEXIS 3043, at *3–4 (10th Cir. Feb. 9, 2024)
- *Johnson v. Johnson*, 466 F.3d 1213, 1217 (10th Cir. 2006)
- *Rachel v. Troutt*, 820 F.3d 390, 397 n.7 (10th Cir. 2016)
- *Mallard v. United States District Court for the Southern District of Iowa*, 490 U.S. 296, 298 (1989)
- *McClelland v. Raemisch*, No. 20-1390, 2021 WL 4469947, at *5 n.3 (10th Cir. Sept. 30, 2021)
- *McCarthy v. Weinberg*, 753 F.2d 836, 838–39 (10th Cir. 1985)
- *Steffey v. Orman*, 461 F.3d 1218, 1223 (10th Cir. 2006)
- *Williams v. Meese*, 926 F.2d 994, 996 (10th Cir. 1991)
- *Greene v. United States Postal Service*, 795 F. App'x 581, 583 (10th Cir. 2019)
- *Gross v. GM LLC*, 441 F. App'x 562, 567 (10th Cir. 2011)
- *Castner v. Colorado Springs Cablevision*, 979 F.2d 1417, 1421 (10th Cir. 1992)