

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
VIRGINIA, RICHMOND DIVISION

Jimante Taylor v. Sgt. Lockhart

No. 3:25CV507 (RCY), United States District Court for the Eastern District of Virginia, Richmond Division
(April 13, 2026)

SUMMARY

The United States District Court for the Eastern District of Virginia dismissed Jimante Taylor’s 42 U.S.C. § 1983 action against Sgt. Lockhart under the Prison Litigation Reform Act. The court held that Taylor failed to plausibly allege deliberate indifference to a serious medical need or a cognizable claim based on an alleged threat to remove him from an institutional program.

CASE DETAILS

COURT	United States District Court for the Eastern District of Virginia, Richmond Division
WRITING FOR THE COURT	Roderick C. Young
JURISDICTION	United States District Court for the Eastern District of Virginia, Richmond Division
DECIDED	April 13, 2026
DOCKET	3:25CV507 (RCY)
DISPOSITION	dismissed
PROCEDURAL POSTURE	A Virginia inmate proceeding pro se and in forma pauperis filed an action under 42 U.S.C. § 1983. The district court screened the particularized complaint under 28 U.S.C. §§ 1915(e)(2) and 1915A and dismissed the action for failure to state a claim and because it was legally frivolous.
STANDARD OF REVIEW	On preliminary review under 28 U.S.C. §§ 1915(e)(2) and 1915A, the court applied the Rule 12(b)(6) standard, accepting well-pleaded factual allegations as true and viewing the complaint in the light most favorable to the plaintiff, while disregarding conclusory allegations and determining whether the complaint plausibly alleged all elements of a claim.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion

PARTIES

Jimante Taylor v. Sgt. Lockhart

TOPICS

prisoners rights

section 1983

due process

fourteenth amendment

motions to dismiss

PRACTICE AREAS

civil rights

constitutional law

prisoner litigation

medical care

QUESTIONS PRESENTED

1. Whether Taylor plausibly alleged that Sgt. Lockhart was deliberately indifferent to a serious medical need in violation of the Fourteenth Amendment.
2. Whether Sgt. Lockhart's alleged threat to charge inmates and remove them from the RISE Program stated a cognizable claim under 42 U.S.C. § 1983.
3. Whether the particularized complaint was subject to dismissal as frivolous or for failure to state a claim under 28 U.S.C. §§ 1915(e)(2) and 1915A.

HOLDINGS

1. Taylor failed to state a viable Fourteenth Amendment deliberate-indifference claim because he did not adequately allege a medical condition posing a substantial risk of serious harm or a constitutionally significant injury resulting from Sgt. Lockhart's conduct.
2. The alleged threat to remove Taylor from the RISE Program and charge inmates who received negative COVID-19 tests did not state a cognizable claim under § 1983 because mere threats or verbal abuse, without more, are insufficient.
3. The action was subject to dismissal under 28 U.S.C. §§ 1915(e)(2) and 1915A because the claims were legally frivolous and failed to state a claim upon which relief could be granted.

KEY QUOTATIONS

“To state a claim for deliberate indifference to a medical need, the specific type of deliberate indifference claim at issue in this case, a pretrial detainee must plead that (1) they had a medical condition or injury that posed a substantial risk of serious harm; (2) the defendant intentionally, knowingly, or recklessly acted or failed to act to appropriately address the risk that the condition posed; (3) the defendant knew or should have known (a) that the detainee had that condition and (b) that the defendant’s action or inaction posed an unjustifiably high risk of harm; and (4) as a result, the detainee was harmed.”

FACTUAL BACKGROUND

In February 2025, Taylor was incarcerated and enrolled in the RISE Program at a regional jail. During a COVID-19 outbreak in his housing pod, he reported feeling sick and losing his sense of taste and smell, and he requested a COVID-19 test. Taylor alleged that Sgt. Lockhart stated that inmates receiving negative tests would be charged

and removed from the RISE Program, and that Taylor thereafter continued feeling sick without receiving treatment.

PROCEDURAL HISTORY

The court directed Taylor to file a particularized complaint because the original allegations did not provide fair notice of the facts and law supporting liability. Taylor filed a particularized complaint naming Sgt. Lockhart as the sole defendant. Upon statutory preliminary review, the court dismissed the claims and directed the Clerk to record the disposition for purposes of 28 U.S.C. § 1915(g).

DISPOSITION

dismissed

CASES CITED

- Clay v. Yates, 809 F. Supp. 417, 427 (E.D. Va. 1992)
- Neitzke v. Williams, 490 U.S. 319, 324, 327 (1989)
- Republican Party of N.C. v. Martin, 980 F.2d 943, 952 (4th Cir. 1992)
- Mylan Lab’ys, Inc. v. Matkari, 7 F.3d 1130, 1134 (4th Cir. 1993)
- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555, 556, 570 (2007)
- Conley v. Gibson, 355 U.S. 41, 47 (1957)
- Bass v. E.I. DuPont de Nemours & Co., 324 F.3d 761, 765 (4th Cir. 2003)
- Dickson v. Microsoft Corp., 309 F.3d 193, 213 (4th Cir. 2002)
- Iodice v. United States, 289 F.3d 270, 281 (4th Cir. 2002)
- Gordon v. Leeke, 574 F.2d 1147, 1151 (4th Cir. 1978)
- Brock v. Carroll, 107 F.3d 241, 243 (4th Cir. 1997) (Luttig, J., concurring)
- Beaudett v. City of Hampton, 775 F.2d 1274, 1278 (4th Cir. 1985)
- Dowe v. Total Action Against Poverty in Roanoke Valley, 145 F.3d 653, 658 (4th Cir. 1998)
- Moss v. Harwood, 19 F.4th 614, 624 (4th Cir. 2021)
- Martin v. Gentile, 849 F.2d 863, 870 (4th Cir. 1988)
- Short v. Hartman, 87 F.4th 593, 604-05, 608-09, 611 (4th Cir. 2023)
- Kingsley v. Hendrickson, 576 U.S. 389, 398 (2015)
- Wingfield v. Henrico Reg’l Jail E., No. 3:25CV171 (DJN), 2025 WL 3209668, at *5 (E.D. Va. Nov. 17, 2025)
- Harvey v. Mahon, No. Civ. A. 7:02cv00829, 2004 WL 3334794, at *6 (W.D. Va. Aug. 30, 2004)
- Brown v. Wagner, No. 8:24-cv-07076-BHH-KFM, 2024 WL 5315321, at *4 (D.S.C. Dec. 13, 2024)
- Cooper v. Casey, 97 F.3d 914, 916 (7th Cir. 1996)
- Wilson v. McKeller, 254 F. App’x 960, 961 (4th Cir. 2007)

