

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
ILLINOIS

Anthony R. Wilson, II v. Blake Sellers, et al.

Wilson · No. 24-cv-518-RJD · Decided April 20, 2026

SUMMARY

The court denied Defendants’ motion for summary judgment in a 42 U.S.C. § 1983 action brought by a pretrial detainee challenging a lockdown and loss of privileges at Madison County Jail. The court held that a reasonable jury could find the approximately 30-day lockdown was punitive rather than a security measure and that Plaintiff was not given constitutionally required notice and an opportunity to be heard. The court also rejected arguments concerning personal involvement, qualified immunity, and the absence of physical injury.

CASE DETAILS

COURT	United States District Court for the Southern District of Illinois
WRITING FOR THE COURT	Reona J. Daly
JURISDICTION	United States District Court for the Southern District of Illinois
DECIDED	April 20, 2026
DOCKET	24-cv-518-RJD
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff brought a 42 U.S.C. § 1983 action alleging that defendants violated his Fourteenth Amendment due process rights by imposing an indefinite lockdown and taking privileges during his pretrial detention. Defendants moved for summary judgment.
STANDARD OF REVIEW	Summary judgment is appropriate 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 viewed the facts and reasonable inferences in the light most favorable to the nonmoving party. A nonmovant's failure to comply with summary-judgment procedures does not automatically entitle the movant to judgment; the movant must still establish entitlement to judgment as a matter of law.
PRECEDENTIAL VALUE	unpublished and nonprecedential district court order
PARTIES	Anthony R. Wilson, II v. Blake Sellers, Tom Schmidt

TOPICS

summary judgment

section 1983

procedural due process

qualified immunity

prisoners rights

PRACTICE AREAS

civil rights

constitutional law

prisoner litigation

federal civil procedure

damages

QUESTIONS PRESENTED

1. Whether defendants were entitled to summary judgment on Wilson's Fourteenth Amendment claim because the lockdown was a security measure rather than punishment requiring procedural due process.
2. Whether the record established that defendants Schmidt and Sellers lacked personal involvement in imposing or extending the lockdown.
3. Whether defendants were entitled to qualified immunity because the right to notice and an opportunity to be heard before a punitive lockdown was not clearly established.
4. Whether the absence of physical injury barred Wilson's recovery of damages under 42 U.S.C. § 1997e(e).

HOLDINGS

1. Summary judgment was not warranted because a reasonable jury could find that the lockdown and loss of privileges became punitive rather than remaining a security measure, and Wilson was entitled to notice and an opportunity to be heard before being subjected to a punitive lockdown.
2. Summary judgment was not warranted on the ground that Schmidt and Sellers lacked personal involvement because the evidence permitted an inference that each participated in imposing or extending the lockdown.
3. Defendants were not entitled to qualified immunity at summary judgment because it was clearly established that a pretrial detainee could not be placed in a punitive lockdown without notice and an opportunity to be heard.
4. The absence of physical injury did not bar nominal or punitive damages for the alleged constitutional violation, although 42 U.S.C. § 1997e(e) barred compensatory damages for mental or emotional injury absent physical injury.

KEY QUOTATIONS

“a pretrial detainee cannot be placed in segregation as a punishment for a disciplinary infraction without notice and an opportunity to be heard . . . [b]ut no process is required if he is placed in segregation not as punishment but for managerial reasons.” (7)

“The conditions of confinement during the lockdown are immaterial to the extent that the lockdown was imposed as punishment for the detainees’ misconduct rather than to further the legitimate governmental purpose of securing the safety and orderly operation of the facility.” (9)

“Here, Plaintiff has asserted a violation of his constitutional rights, which “is itself a cognizable injury, regardless of any resulting mental or emotional injury.”” (12)

FACTUAL BACKGROUND

Anthony Wilson was a pretrial detainee in the E-South housing unit of Madison County Jail when staff discovered that a battery was missing from a shared electric razor on January 28, 2024. Jail officials searched the detainees and cells, then imposed a unit-wide lockdown that initially eliminated out-of-cell time and access to some privileges and later allowed one hour of individual out-of-cell time per day. The lockdown lasted approximately 30 or 31 days, and Wilson alleged that it was punishment for the missing battery without notice or an opportunity to be heard. Wilson alleged mental and emotional distress but no physical injury.

PROCEDURAL HISTORY

Following screening under 28 U.S.C. § 1915A, plaintiff was permitted to proceed on a Fourteenth Amendment claim against Tom Schmidt and Blake Sellers. Plaintiff did not timely or substantively respond to defendants' summary-judgment motion, but the court independently reviewed the record and deemed supported material facts admitted under the local rules. The court denied defendants' motion, finding material factual disputes concerning whether the lockdown was punitive or managerial, defendants' personal involvement, qualified immunity, and the availability of damages.

DISPOSITION

other

CASES CITED

- Celotex Corp. v. Catrett, 477 U.S. 317, 322-23 (1986)
- Ruffin-Thompkins v. Experian Information Solutions, Inc., 422 F.3d 603, 607 (7th Cir. 2005)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248, 250 (1986)
- Estate of Simpson v. Gorbett, 863 F.3d 740, 745 (7th Cir. 2017)
- Keeton v. Morningstar, Inc., 667 F.3d 877, 884 (7th Cir. 2012)
- Raymond v. Ameritech Corp., 442 F.3d 600, 608 (7th Cir. 2006)
- Reales v. Consolidated Rail Corp., 84 F.3d 993, 997 (7th Cir. 1996)
- Apex Digital, Inc. v. Sears, Roebuck & Co., 735 F.3d 962, 965 (7th Cir. 2013)
- Zinermon v. Burch, 494 U.S. 113, 125 (1990)
- Holly v. Woolfolk, 415 F.3d 678, 679-80 (7th Cir. 2005)
- Rapier v. Harris, 172 F.3d 999, 1003-05 (7th Cir. 1999)
- Bell v. Wolfish, 441 U.S. 520, 538, 540 n. 23 (1979)
- Pell v. Procunier, 417 U.S. 817, 827 (1974)
- Higgs v. Carver, 286 F.3d 437, 438-39 (7th Cir. 2002)
- Roundtree v. Dart, No. 23-2576, 2025 WL 401207, at *2 (7th Cir. Feb. 5, 2025)

- *Mulvania v. Sheriff of Rock Island Cnty.*, 850 F.3d 849 (7th Cir. 2017)
- *Mays v. Dart*, 974 F.3d 810 (7th Cir. 2020)
- *Johnson v. Murray*, No. 23-1805, 2024 WL 208152, at *2 (7th Cir. Jan. 19, 2024)
- *Bostic v. Murray*, 160 F.4th 831, 841, 843 (7th Cir. 2025)
- *Harlow v. Fitzgerald*, 457 U.S. 800, 818 (1982)
- *Volkman v. Ryker*, 736 F.3d 1084, 1090 (7th Cir. 2013)
- *Saucier v. Katz*, 533 U.S. 194, 201 (2001)
- *Pearson v. Callahan*, 555 U.S. 223, 236-42 (2009)
- *Calhoun v. DeTella*, 319 F.3d 936, 940 (7th Cir. 2003)

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