

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
PENNSYLVANIA

In re: Shadaya Miller

Civil Action No. 25-CV-5723 · No. 2:25-cv-05723 · Decided January 8, 2026

SUMMARY

The United States District Court for the Eastern District of Pennsylvania grants Shadaya Miller leave to proceed in forma pauperis and dismisses her amended complaint with prejudice under 28 U.S.C. § 1915(e)(2)(B)(ii). The court holds that Chester County Prison is not a person subject to suit under 42 U.S.C. § 1983 and that requiring an inmate to eat in a cell near a toilet does not plausibly establish an unconstitutional condition of confinement. The court declines to grant leave to amend because amendment would be futile.

CASE DETAILS

COURT	United States District Court for the Eastern District of Pennsylvania
WRITING FOR THE COURT	Kain R. Scott
JURISDICTION	United States District Court for the Eastern District of Pennsylvania
DECIDED	January 8, 2026
DOCKET	2:25-cv-05723
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se prisoner filed an amended 42 U.S.C. § 1983 complaint concerning conditions of confinement and sought leave to proceed in forma pauperis. The district court granted in forma pauperis status and screened the amended complaint under 28 U.S.C. § 1915(e)(2)(B)(ii).
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2)(B)(ii), the court applies the same standard used for a motion to dismiss under Federal Rule of Civil Procedure 12(b)(6): accepting well-pleaded factual allegations as true, drawing reasonable inferences in the plaintiff's favor, and determining whether the complaint states a plausible claim for relief. Conclusory allegations are insufficient, although pro se pleadings are construed liberally.
PRECEDENTIAL VALUE	unpublished
PARTIES	Shadaya Miller v. Chester County Prison

TOPICS

motions to dismiss

section 1983

prisoners rights

cruel and unusual punishment

due process

PRACTICE AREAS

civil procedure

prisoner civil rights

constitutional law

conditions of confinement

in forma pauperis screening

QUESTIONS PRESENTED

1. Whether Chester County Prison is a proper defendant under 42 U.S.C. § 1983.
2. Whether requiring an inmate to eat in a cell with a toilet approximately six feet from the bedding area, together with alleged sickness and MRSA, plausibly states an unconstitutional conditions-of-confinement claim.
3. Whether the allegations would state a claim under the Fourteenth Amendment if they concerned a period when Miller was a pretrial detainee.
4. Whether the amended complaint should be dismissed with prejudice without leave to amend.

HOLDINGS

1. A jail or correctional facility is not a person subject to suit under 42 U.S.C. § 1983 and therefore is not a proper defendant in a § 1983 action.
2. The allegations that Miller was required to eat in a cell containing a toilet, even accompanied by allegations of sickness and MRSA, did not plausibly allege an objectively sufficiently serious deprivation or deliberate indifference in violation of the Eighth Amendment.
3. Even if the amended complaint were construed as challenging conditions during a period when Miller was a pretrial detainee, the allegations would not state a constitutional claim.
4. The amended complaint was dismissed with prejudice because amendment would be futile.

KEY QUOTATIONS

“To state a claim under § 1983, a plaintiff must allege the violation of a right secured by the Constitution and laws of the United States, and must show that the alleged deprivation was committed by a person acting under color of state law.”

“Courts apply a two-prong test to determine whether prison officials violated the Eighth Amendment: “(1) the deprivation must be ‘objectively, sufficiently serious; a prison official’s act or omission must result in the denial of the minimal civilized measure of life’s necessities’; and (2) the prison official must have been ‘deliberately indifferent to inmate health or safety.’”

FACTUAL BACKGROUND

Miller alleged that, beginning August 29, 2024, she was required on numerous occasions to eat in her cell at Chester County Prison, where the toilet was approximately six feet from the bedding area. She alleged that the

conditions made her sick and that she contracted MRSA. She named Chester County Prison as the sole defendant and sought monetary damages for each day she had to eat in her cell.

PROCEDURAL HISTORY

Miller filed the action on October 2, 2025, without paying the filing fee or submitting an in forma pauperis application and without filing a proper complaint. The court gave her thirty days to correct the deficiencies, but dismissed the action without prejudice for failure to prosecute when she did not timely respond. Miller later filed an in forma pauperis application, a prison account statement, and an amended complaint. The court construed those submissions as an effort to comply with its earlier order, vacated the prior dismissal, granted in forma pauperis status, and dismissed the amended complaint with prejudice for failure to state a claim.

DISPOSITION

dismissed

CASES CITED

- *Tourscher v. McCullough*, 184 F.3d 236, 240 (3d Cir. 1999)
- *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009)
- *Talley v. Wetzel*, 15 F.4th 275, 286 n.7 (3d Cir. 2021)
- *Shorter v. United States*, 12 F.4th 366, 374 (3d Cir. 2021)
- *Fisher v. Hollingsworth*, 115 F.4th 197 (3d Cir. 2024)
- *Martinez v. UPMC Susquehanna*, 986 F.3d 261, 266 (3d Cir. 2021)
- *Vogt v. Wetzel*, 8 F.4th 182, 185 (3d Cir. 2021)
- *Mala v. Crown Bay Marina, Inc.*, 704 F.3d 239, 244-45 (3d Cir. 2013)
- *West v. Atkins*, 487 U.S. 42, 48 (1988)
- *Beaver v. Union Cnty. Pennsylvania*, 619 F. App'x 80, 83 (3d Cir. 2015) (per curiam)
- *Will v. Mich. Dep't of State Police*, 491 U.S. 58, 64 (1989)
- *Edwards v. Bucks Cnty. Corr. Facility*, No. 19-4923, 2019 WL 5579486, at *2 (E.D. Pa. Oct. 29, 2019)
- *Cephas v. George W. Hill Corr. Facility*, No. 09-6014, 2010 WL 2854149, at *1 (E.D. Pa. July 20, 2010)
- *Miller v. Curran-Fromhold Corr. Facility*, No. 13-7680, 2014 WL 4055846, at *2 (E.D. Pa. Aug. 13, 2014)
- *Mitchell v. Chester Cnty. Farms Prison*, 426 F. Supp. 271 (E.D. Pa. 1976)
- *Hubbard v. Taylor*, 399 F.3d 150, 166 (3d Cir. 2005)
- *Montanez v. Price*, 154 F.4th 127, 140 (3d Cir. 2025)
- *Porter v. Pennsylvania Dep't of Corr.*, 974 F.3d 431, 441 (3d Cir. 2020)
- *Farmer v. Brennan*, 511 U.S. 825, 834, 837 (1994)
- *Barndt v. Wenerowicz*, 698 F. App'x 673, 677 (3d Cir. 2017) (per curiam)
- *Rhodes v. Chapman*, 452 U.S. 337, 347 (1981)
- *Whitley v. Albers*, 475 U.S. 312, 319 (1986)

- Horst v. Litz, No. 23-00917, 2023 WL 4827077, at *3 (M.D. Pa. July 27, 2023)
- Alston v. George Little, P.A., No. 22-0183, 2023 WL 5943456, at *9 (W.D. Pa. May 15, 2023)
- Moore v. Carbon Cnty. Corr. Facility, No. 19-0233, 2020 WL 1486845, at *3 (M.D. Pa. Jan. 10, 2020)
- Flores v. Wagner, No. 11-1846, 2011 WL 2681596, at *5 (E.D. Pa. July 8, 2011)
- Carroll v. George W. Hill Corr. Facility, No. 22-1720, 2022 WL 17539212, at *9 (E.D. Pa. Dec. 8, 2022)
- Randall v. Cnty. of Berks, No. 14-5091, 2015 WL 5027542, at *15 (E.D. Pa. Aug. 24, 2015)
- Mestre v. Wagner, No. 11-2191, 2012 WL 299652, at *4 & n.4 (E.D. Pa. Feb. 1, 2012)
- Grayson v. Mayview State Hosp., 293 F.3d 103, 108 (3d Cir. 2002)

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