

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
INDIANA

Larry Craig v. D. Reagle, Warden, et al.

No. 1:23-cv-02075-JRS-MKK (S.D. Ind. Feb. 11, 2026) · No. 1:23-cv-02075-JRS-MKK · Decided February 11, 2026

SUMMARY

The United States District Court for the Southern District of Indiana granted defendants' motions for summary judgment in Larry Craig's Eighth Amendment action concerning restricted outdoor recreation at Pendleton Correctional Facility. The court held that COVID-19 quarantines and staffing shortages did not establish a constitutional violation and that defendants were alternatively entitled to qualified immunity. Final judgment was directed to issue separately.

CASE DETAILS

COURT	United States District Court for the Southern District of Indiana
WRITING FOR THE COURT	James R. Sweeney I, Chief Judge
JURISDICTION	United States District Court for the Southern District of Indiana
DECIDED	February 11, 2026
DOCKET	1:23-cv-02075-JRS-MKK
DISPOSITION	other
PROCEDURAL POSTURE	Prisoner civil-rights action under 42 U.S.C. § 1983 alleging that correctional officials violated the Eighth Amendment by denying or limiting outdoor recreation during COVID-19 quarantines and staffing shortages. Defendants moved for summary judgment and asserted qualified immunity.
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 evidence and drew reasonable inferences in favor of the nonmoving party, without weighing evidence or making credibility determinations. For qualified immunity, the plaintiff had to show both a constitutional violation and violation of a clearly established right.
PRECEDENTIAL VALUE	Nonprecedential district-court opinion; precedential status not stated in the source metadata.

PARTIES

Larry Craig v. D. Reagle, Warden, Mike Conyers, Jim Boldman, Jason Ernest, Jonathan Jackson

TOPICS

summary judgment

qualified immunity

prisoners rights

cruel and unusual punishment

section 1983

PRACTICE AREAS

prisoner civil rights

constitutional law

summary judgment

qualified immunity

Eighth Amendment litigation

QUESTIONS PRESENTED

1. Whether COVID-19-related quarantines and staffing shortages that limited Craig's outdoor recreation violated the Eighth Amendment.
2. Whether defendants were entitled to qualified immunity because their conduct did not violate a clearly established constitutional right.
3. Whether defendants were entitled to summary judgment because Craig relied only on speculation to dispute the legitimacy of the quarantines and staffing shortages.

HOLDINGS

1. The temporary limitation of outdoor recreation caused by COVID-19 quarantines and unavoidable staffing shortages did not violate Craig's Eighth Amendment rights where the restrictions were applied across the housing unit, were based on safety and disease-control concerns, and Craig did not show that he was unable to exercise in his cell.
2. Defendants were entitled to qualified immunity because Craig did not identify clearly established Supreme Court or Seventh Circuit authority placing officials on notice that restricting outdoor recreation to prevent the spread of a novel communicable disease violated the Eighth Amendment.
3. Craig's speculation that defendants created false quarantines or artificial staffing shortages was insufficient to create a genuine dispute of material fact.

KEY QUOTATIONS

"No reasonable jury would find that COVID-19 pandemic related quarantines imposed at Pendleton or unavoidable staff shortages violate a prisoner's constitutional rights, at a time when the outside world was also experiencing quarantines and limited access to facilities and services."

"No case law would put Defendants on notice that restricting exercise to prevent the spread of a novel communicable disease would be a violation of a prisoner's civil rights."

"Accordingly, the Court concludes that Defendants are entitled to qualified immunity."

FACTUAL BACKGROUND

Larry Craig was an Indiana Department of Correction inmate housed at Pendleton Correctional Facility. He alleged that he received no recreation during November and December 2021, when his housing unit was quarantined for portions of that period, and when the facility experienced staffing shortages related to COVID-19. Recreation resumed in January 2022 and occurred at least weekly for much of the period thereafter, although it was sometimes irregular. Craig did not present evidence that he was unable to exercise in his cell, where he had no cellmate, or that the quarantines and staffing shortages were fabricated.

PROCEDURAL HISTORY

The court previously screened the complaint under 28 U.S.C. § 1915A and allowed Craig to proceed on Eighth Amendment claims concerning lack of recreation. After discovery, defendants moved for summary judgment. The court granted the motion, concluding that the evidence did not establish an Eighth Amendment violation and that defendants were alternatively entitled to qualified immunity. Final judgment was to issue separately.

DISPOSITION

other

CASES CITED

- *Khungar v. Access Cmty. Health Network*, 985 F.3d 565, 572-73
- *Miller v. Gonzalez*, 761 F.3d 822, 827
- *Grant v. Trs. of Ind. Univ.*, 870 F.3d 562, 573-74
- *Celotex Corp. v. Catrett*, 477 U.S. 317, 323 (1986)
- *French v. Owens*, 777 F.2d at 1250, 1255
- *Antonelli v. Sheahan*, 81 F.3d 1422, 1432
- *Delaney v. DeTella*, 256 F.3d 679, 684
- *Thomas v. Ramos*, 130 F.3d 754, 764
- *Smith v. Dart*, 803 F.3d 304, 313 (7th Cir. 2015)
- *Watt v. Ramos*, 948 F. Supp. 739, 743-44 (7th Cir. 1996)
- *Henderson v. Lane*, 979 F.2d 466, 468 (7th Cir. 1992)
- *Harris v. Fleming*, 839 F.2d 1232, 1236 (7th Cir. 1988)
- *White v. City of Chicago*, 829 F.3d 837, 841 (7th Cir. 2016)
- *Leiser v. Kloth*, 933 F.3d 696, 701 (7th Cir. 2019)
- *Koh v. Ustich*, 933 F.3d 836, 844 (7th Cir. 2019)
- *Reed v. Palmer*, 906 F.3d 540, 546
- *Mullenix v. Luna*, 577 U.S. 7, 11-12 (2015)
- *Carroll v. Carman*, 574 U.S. 13, 17 (2014)
- *Thomas*, 918 F. Supp. 228
- *Morissette v. Ramos*, No. 94 C 3426, 1996 WL 521170 (N.D. Ill. Sept. 5, 1996)
- *Pritchett v. Godinez*, No. 94 C 5724, 1996 WL 164396 (N.D. Ill. Mar. 29, 1996)

- Helling v. McKinney, 509 U.S. 25, 33 (1993)
- Estate of Clark v. Walker, 865 F.3d 544, 553 (7th Cir. 2017)
- Jones v. Burt, Case No. 1:21-cv-41, 2022 WL 4244298, *5 (W.D. Mich. July 15, 2022)
- Ross v. Russell, Case No. 7:20-cv-000774, 2022 WL 767093, *14 (W.D. Va. Mar. 14, 2022)

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