

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA

Taylor v. Neal, et al.

Taylor · No. 3:25-CV-613-GSL-JEM · Decided February 12, 2026

SUMMARY

The United States District Court for the Northern District of Indiana denied Starlene G. Taylor’s motion for a preliminary injunction seeking protection from alleged threats and violence by other prisoners. The court held that Taylor had not shown a likelihood of success on her Eighth Amendment failure-to-protect claim or irreparable harm, and found that prison officials had taken reasonable protective measures. The court also denied Taylor’s motions for sanctions and to compel, granted the Warden’s motion to seal certain records, and directed that specified filings remain under seal.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana
WRITING FOR THE COURT	Gretchen S. Lund
JURISDICTION	United States District Court for the Northern District of Indiana
DECIDED	February 12, 2026
DOCKET	3:25-CV-613-GSL-JEM
DISPOSITION	other
PROCEDURAL POSTURE	Prisoner civil-rights action under 42 U.S.C. § 1983; the court construed the complaint as including a motion for a preliminary injunction and resolved that motion, motions for sanctions, a motion to compel, and a motion to seal.
STANDARD OF REVIEW	Preliminary injunction: the movant must show some likelihood of success on the merits, no adequate remedy at law, and irreparable harm; if those threshold requirements are met, the court balances the harms and considers the public interest. Sanctions: inherent-authority sanctions require bad faith, an intent to obstruct the judicial process, or violation of a court order. Sealing: documents bearing on the merits are presumptively public, although the court permitted sealing at this stage because the motion was unopposed and the records' materiality was unclear.
PRECEDENTIAL VALUE	unpublished district court opinion

PARTIES

Starlene G. Taylor, a/k/a Gregory A. Taylor v. Ron Neal, et al.

TOPICS

prisoners rights

injunctions

section 1983

civil rights

sanctions

PRACTICE AREAS

prisoner civil rights

constitutional litigation

injunctive relief

sanctions

sealing of court records

QUESTIONS PRESENTED

1. Whether Taylor was entitled to a preliminary injunction requiring protection from other prisoners based on an alleged substantial risk of serious harm and deliberate indifference by prison officials.
2. Whether Taylor established grounds for sanctions against the Warden based on alleged misrepresentations in the response.
3. Whether the court should compel defense counsel, the Warden, and witnesses to use Taylor's preferred name and female pronouns.
4. Whether the Warden's medical and departmental safety records should be filed under seal.

HOLDINGS

1. Taylor was not entitled to a preliminary injunction because she failed to show a likelihood of success on her failure-to-protect claim or irreparable harm, and the record showed that prison officials had taken reasonable measures to protect her rather than acting with deliberate indifference.
2. Sanctions were unwarranted because Taylor did not show that the Warden's alleged errors or statements were made in bad faith, intended to obstruct the judicial process, or violated a court order.
3. The motion to compel was denied because compelling the requested references raised substantial First Amendment concerns, notwithstanding the court's view that Taylor's request was reasonable and its own compliance with the request.
4. The motion to seal was granted at that stage because it was unopposed and it was unclear whether the records would be material to resolving the case, but materials relied upon in a dispositive motion would presumptively become part of the public record.

KEY QUOTATIONS

“[A] party seeking a preliminary injunction must demonstrate (1) some likelihood of succeeding on the merits, and (2) that it has no adequate remedy at law and will suffer irreparable harm if preliminary relief is denied.”

“The Eighth Amendment imposes a duty on prison officials “to take reasonable measures to guarantee the safety of inmates.””

“What happens in the halls of government is presumptively open to public scrutiny. Judges deliberate in private but issue public decisions after public arguments based on public records.”

FACTUAL BACKGROUND

Taylor, a transgender woman incarcerated at Indiana State Prison, alleged that staff destroyed female undergarments and makeup, disclosed her transgender status to other inmates, and exposed her to threats of rape, burning, beating, and stabbing. She requested protective custody, but prison officials denied the request because she identified no specific perpetrators or details and officials concluded that restrictive housing, where she was housed alone and had no physical contact with other inmates, was safer than protective custody. After Taylor later reported assaults, she declined to cooperate with an investigation, which found that ordinary restrictive-housing procedures did not permit the alleged assaults to occur.

PROCEDURAL HISTORY

Taylor alleged that prison staff exposed her transgender status, destroyed personal property, and failed to protect her from threats and assaults by other prisoners. The court ordered the Warden to respond to the preliminary-injunction request. After granting Taylor two extensions, the court denied a further extension and decided the preliminary-injunction motion on the existing record because Taylor had not filed a timely reply and had later filed an amended complaint omitting the alleged risk of harm. The court also denied Taylor's sanctions and motion-to-compel requests, granted the Warden's motion to seal, and directed specified filings to remain under seal.

DISPOSITION

other

CASES CITED

- Cassell v. Snyders, 990 F.3d 539, 544–45 (7th Cir. 2021)
- Mazurek v. Armstrong, 520 U.S. 968, 972 (1997)
- Winter v. Natural Resources Defense Council, Inc., 555 U.S. 7, 24 (2008)
- Weinberger v. Romero-Barcelo, 456 U.S. 305, 312 (1982)
- Farmer v. Brennan, 511 U.S. 825, 832–33 (1994)
- Santiago v. Walls, 599 F.3d 749, 756 (7th Cir. 2010)
- Duane v. Lane, 959 F.2d 673, 677 (7th Cir. 1992)
- Board v. Farnham, 394 F.3d 469, 478 (7th Cir. 2005)
- Secrease v. W. & S. Life Ins. Co., 800 F.3d 397, 401 (7th Cir. 2015)
- Kelly Fuery v. City of Chicago, Fuery v. City of Chicago, 900 F.3d 450, 463–64 (7th Cir. 2018)
- Darlingh v. Maddaleni, 142 F.4th 558, 566 (7th Cir. 2025)
- Kluge v. Brownsburg Community School Corp., 432 F. Supp. 3d 823, 839 (S.D. Ind. 2020)
- Baxter International, Inc. v. Abbott Laboratories, 297 F.3d 544, 546 (7th Cir. 2002)
- Matter of Krynicki, 983 F.2d 74, 75 (7th Cir. 1992)

