

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF CONNECTICUT

James Mitchell v. Warden Robert Martin, et al.

Mitchell v. Martin · No. 3:23-CV-902 (KAD) · Decided March 31, 2026

SUMMARY

The United States District Court for the District of Connecticut granted Defendants’ cross-motion for summary judgment and denied Plaintiff James Mitchell’s motion for summary judgment in a 42 U.S.C. § 1983 action. The court rejected claims concerning alleged interference with legal mail, unequal access to a Native American sweat lodge, and an allegedly unlawful strip search. The court concluded that the mail incident was isolated, the sweat-lodge restriction had legitimate safety and logistical justifications, and the strip search was conducted pursuant to legitimate penological interests and applicable policy.

CASE DETAILS

COURT	United States District Court for the District of Connecticut
WRITING FOR THE COURT	Kari A. Dooley
JURISDICTION	United States District Court for the District of Connecticut
DECIDED	March 31, 2026
DOCKET	3:23-CV-902 (KAD)
DISPOSITION	other
PROCEDURAL POSTURE	Cross-motions for summary judgment in a pro se prisoner civil-rights action under 42 U.S.C. § 1983.
STANDARD OF REVIEW	Summary judgment is proper 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 construes facts in the nonmovant's favor, resolves ambiguities and reasonable inferences against the movant, and requires the nonmoving party to present specific evidence permitting a reasonable jury to find in its favor. A court may deny a summary-judgment motion for failure to comply with applicable local-rule requirements, including the requirement to submit a properly supported statement of material facts.
PRECEDENTIAL VALUE	unpublished district-court memorandum; precedential status unknown
PARTIES	James Mitchell v. Warden Robert Martin, Rachel Fontaine, Czikowsky

TOPICS

summary judgment

section 1983

prisoners rights

first amendment

equal protection

PRACTICE AREAS

civil rights

constitutional law

prisoner litigation

federal civil procedure

QUESTIONS PRESENTED

1. Whether Mitchell was entitled to summary judgment despite failing to comply with the District of Connecticut's Local Rule 56(a) requirements.
2. Whether a single mistaken opening of legal mail, together with alleged brief mail delays and postage discrepancies, established an actionable First Amendment violation.
3. Whether denying Mitchell access to a sweat lodge at Corrigan, while such facilities existed at other Connecticut prisons, violated the Fourteenth Amendment's Equal Protection Clause.
4. Whether the challenged strip search was unreasonable under the Fourth Amendment or was conducted maliciously, sadistically, or for purposes of intimidation, harassment, or embarrassment under the Eighth Amendment.
5. Whether claims raised for the first time in summary-judgment briefing under RLUIPA, the Connecticut Religious Freedom Act, or concerning previously dismissed religious-materials claims could be considered.

HOLDINGS

1. The court denied Mitchell's motion for summary judgment with prejudice because he failed to comply with Local Rules 56(a)1 and 56(a)3 by not filing a proper statement of material facts and by failing to provide adequate record citations. The court nevertheless considered the motion and its exhibits in resolving defendants' motion.
2. The isolated mistaken opening of Mitchell's legal mail, together with the asserted delays and postage discrepancies, did not establish a First Amendment violation because the evidence did not show an ongoing, unjustified practice of censorship or tampering, intentional interference, chilling of court access, or impairment of legal representation.
3. The denial of access to a sweat lodge at Corrigan, despite sweat lodges at other Connecticut facilities, did not violate the Equal Protection Clause because the policy was rationally related to legitimate penological and safety interests.
4. The strip search was reasonable under the Fourth Amendment and therefore unconstitutional conduct was not shown. The court also held that the record could not support an Eighth Amendment claim because the search was not malicious, sadistic, intimidating, harassing, or intended to embarrass Mitchell.

KEY QUOTATIONS

“For all of the foregoing reasons, the Court finds that no reasonable jury could determine that Defendant Fontaine intentionally interfered or tampered with Plaintiff’s mail in violation of the First Amendment.” (First Amendment – Mail Interference)

“Here, Defendant Martin has established a rational basis for the failure to have a sweat lodge at Corrigan.” (Fourteenth Amendment– Equal Protection)

“Based on the foregoing undisputed facts, the Court concludes that Plaintiff’s strip search was not unreasonable and therefore not unconstitutional under the Fourth Amendment.” (Fourth Amendment – Strip Search)

“For all of the foregoing reasons, Plaintiff’s Motion for Summary Judgment is DENIED, and Defendants’ Motion for Summary Judgment is GRANTED.” (Conclusion)

FACTUAL BACKGROUND

Mitchell was incarcerated at Corrigan Correctional Center from May 1 through October 19, 2023. A letter from a law firm was mistakenly identified as social mail and opened outside Mitchell's presence on one occasion, although his other mail was generally processed and all outgoing mail was ultimately sent. Corrigan had no sweat lodge because of courtyard size, emergency-access, ventilation, fire, and recreation concerns, while other Connecticut facilities had sweat lodges. After prison staff suspected contraband in Mitchell's cell, he underwent a private, less-than-four-minute visual strip search involving a bend-and-spread instruction; no officer touched him, and his cellmate's urine later tested positive.

PROCEDURAL HISTORY

Mitchell filed a third amended complaint challenging alleged mail tampering, differential access to sweat-lodge facilities, and a strip search. After review under 28 U.S.C. § 1915A, the court allowed a First Amendment mail claim, a Fourteenth Amendment equal-protection claim, and a Fourth and/or Eighth Amendment strip-search claim to proceed. Mitchell moved for summary judgment, and the defendants cross-moved for summary judgment. The court denied Mitchell's motion with prejudice, granted defendants' motion, directed entry of judgment for defendants, and closed the case.

DISPOSITION

other

CASES CITED

- S.E.C. v. Global Telecom Services, L.L.C., 325 F. Supp. 2d 94, 108 (D. Conn. 2004)
- Iwachiw v. New York State Department of Motor Vehicles, 396 F.3d 525, 529 n.1 (2d Cir. 2005)
- Donald v. Cook County Sheriff's Department, 95 F.3d 548, 555 (7th Cir. 1996)
- Tross v. Ritz Carlton Hotel Co. LLC, 928 F. Supp. 2d 498, 503–04 (D. Conn. 2013)
- Wilson v. McKenna, 2015 WL 5455634, at *3 (D. Conn. Sept. 15, 2015), aff'd, 661 F. App'x 750 (2d Cir. 2016)

- *Adeyemi v. Lightner*, 2014 WL 580226, at *4 (D. Conn. Feb. 12, 2014)
- *Collins v. Experian Credit Reporting Services*, 2006 WL 2850411, at *1 (D. Conn. Oct. 3, 2006)
- *Small v. Clements*, 2019 WL 5727388, at *1 n.1 (D. Conn. Nov. 5, 2019)
- *Colon v. Coughlin*, 58 F.3d 865, 872 (2d Cir. 1995)
- *Conquistador v. Adamaitis*, 2021 WL 810361, at *8 (D. Conn. Mar. 3, 2021)
- *Irizarry v. Lily Transportation Corp.*, 266 F. Supp. 3d 600, 604 (D. Conn. 2017)
- *Nick's Garage, Inc. v. Progressive Casualty Insurance Co.*, 875 F.3d 107, 113–14 (2d Cir. 2017)
- *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 248 (1986)
- *Giordano v. Market America, Inc.*, 599 F.3d 87, 93 (2d Cir. 2010)
- *Kee v. City of New York*, 12 F.4th 150, 158 (2d Cir. 2021)
- *Celotex Corp. v. Catrett*, 477 U.S. 317, 323 (1986)
- *Brown v. Eli Lilly & Co.*, 654 F.3d 347, 358 (2d Cir. 2011)
- *Robinson v. Concentra Health Services*, 781 F.3d 42, 44 (2d Cir. 2015)
- *Hicks v. Baines*, 593 F.3d 159, 166 (2d Cir. 2010)
- *Graham v. Long Island Railroad*, 230 F.3d 34, 38 (2d Cir. 2000)
- *Davis v. Goord*, 320 F.3d 346, 351 (2d Cir. 2003)
- *Washington v. James*, 782 F.2d 1134, 1139 (2d Cir. 1986)
- *Singleton v. Williams*, 2014 WL 2095024, at *3–4 (S.D.N.Y. May 20, 2014)
- *Edwards v. Horn*, 2012 WL 760172, at *7 (S.D.N.Y. Mar. 8, 2012)
- *Gibson v. Reardon*, 2025 WL 2527532, at *6 (N.D.N.Y. Aug. 11, 2025), report and recommendation adopted, 2025 WL 2505539 (N.D.N.Y. Sept. 2, 2025)
- *Walker v. New York City*, 2023 WL 6608476, at *5 (S.D.N.Y. Oct. 10, 2023)
- *City of Cleburne v. Cleburne Living Center, Inc.*, 473 U.S. 432, 439 (1985)
- *Pedersen v. Office of Personnel Management*, 881 F. Supp. 2d 294, 309 (D. Conn. 2012)
- *Romer v. Evans*, 517 U.S. 620, 631 (1996)
- *Wright v. Smith*, 21 F.3d 496, 501 (2d Cir. 1994)
- *Robles v. Dennison*, 745 F. Supp. 2d 244, 301 n.18 (W.D.N.Y. 2010), *aff'd*, 449 F. App'x 51 (2d Cir. 2011)
- *Green v. Santiago*, 2017 WL 2312355, at *8 (D. Conn. May 26, 2017)
- *Benjamin v. Coughlin*, 905 F.2d 571, 575 (2d Cir. 1990)
- *Baltas v. Chapdelaine*, 153 F.4th 328, 339–40 (2d Cir. 2025)
- *Pevia v. Hogan*, 443 F. Supp. 3d 612, 641 (D. Md. 2020)
- *Cryer v. Clarke*, 2012 WL 6800791, at *10 (D. Mass. Sept. 7, 2012)
- *Hudson v. Palmer*, 468 U.S. 517, 526 (1984)
- *Covino v. Patrissi*, 967 F.2d 73, 78 (2d Cir. 1992)
- *Harris v. Miller*, 818 F.3d 49, 58, 65 (2d Cir. 2016)
- *Crenshaw v. Ross*, 2025 WL 3514682, at *4 (D. Conn. Dec. 8, 2025)
- *Jean-Laurent v. Wilkerson*, 438 F. Supp. 2d 318, 323 (S.D.N.Y. 2006), *aff'd*, 461 F. App'x 18 (2d Cir. 2012)

- Lewis v. Erfe, 2020 WL 1531332, at *14 (D. Conn. Mar. 30, 2020)
- Florence v. Board of Chosen Freeholders, 566 U.S. 318, 328 (2012)
- Galarza v. Erfe, 2019 WL 121784, at *4 (D. Conn. Jan. 7, 2019)
- Dixon v. Santiago, 2015 WL 9582729, at *3 (D. Conn. Dec. 30, 2015)
- Olivencia v. Pun, 2022 WL 4329343, at *2 n.3 (D. Conn. Sept. 19, 2022)
- Scott v. Harris, 550 U.S. 372, 380–81 (2007)

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