

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Albert E. Martinez v. Jason Berfield, et al.

Civ. Action No. 1:20-CV-1759 · No. Civ. Action No. 1:20-CV-1759 · Decided November 26, 2025

SUMMARY

The United States District Court for the Middle District of Pennsylvania held that prison officials’ mishandling of Albert E. Martinez’s grievance rendered the administrative-remedy process unavailable under the Prison Litigation Reform Act. The court therefore excused Martinez’s failure to exhaust administrative remedies and directed that the remaining Eighth Amendment claims proceed to trial.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Malachy E. Mannion
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	November 26, 2025
DOCKET	Civ. Action No. 1:20-CV-1759
DISPOSITION	other
PROCEDURAL POSTURE	The court conducted an evidentiary hearing to determine whether the prisoner exhausted available administrative remedies before filing his 42 U.S.C. § 1983 action. The issue remained after the prior summary-judgment ruling left Martinez's Eighth Amendment claim against Berfield and Evans unresolved.
STANDARD OF REVIEW	The district court may resolve factual disputes concerning exhaustion without a jury. Failure to exhaust is an affirmative defense that defendants must plead and prove; if defendants establish nonexhaustion, the prisoner bears the burden of showing that administrative remedies were unavailable.
PRECEDENTIAL VALUE	unpublished district court memorandum; nonprecedential
PARTIES	Albert E. Martinez v. Jason Berfield, Evans, et al.

TOPICS

- prisoners rights
- section 1983
- affirmative defenses
- civil procedure
- evidence

PRACTICE AREAS

prisoner civil rights

civil procedure

federal courts

QUESTIONS PRESENTED

1. Whether defendants proved that Martinez failed to exhaust available administrative remedies.
2. Whether prison officials' failure to process Martinez's second grievance as a resubmission rendered the grievance process unavailable under the PLRA.
3. Whether Martinez's failure to appeal the rejected grievance was immaterial because the grievance process had already become unavailable.

HOLDINGS

1. Defendants met their initial burden to show that Martinez failed to exhaust administrative remedies because he did not file a valid appeal of either relevant grievance.
2. Prison officials' mistake in treating Martinez's second grievance as a new grievance rather than a resubmission rendered the grievance process unavailable, excusing exhaustion under the PLRA.
3. Martinez's subsequent failure to appeal was immaterial because administrative remedies became unavailable when officials failed to process the second grievance as a resubmission.
4. Talley v. Clark did not require Martinez to request an extension after the grievance process became unavailable because this case involved prison officials' failure to comply with their own grievance rules, not a temporary inability to file a grievance.

KEY QUOTATIONS

"Although Heist testified credibly that she simply made a mistake in processing Martinez's grievance, her actions effectively created a "blind alley" or "quagmire" that made it impossible to exhaust administrative remedies." (Conclusions of Law ¶ 2 n.3)

"For the foregoing reasons, the court concludes that the affirmative defense of failure to exhaust administrative remedies fails. The court will schedule this case for a trial on the merits of plaintiff's claims." (Conclusion)

FACTUAL BACKGROUND

Martinez, an inmate at SCI-Camp Hill, filed a grievance concerning alleged civil-rights violations during a five-day dry-cell confinement. The prison rejected his first grievance for exceeding the two-page limit and challenging administrative-custody procedures. Martinez submitted a second grievance expressly identifying itself as a resubmission, but prison officials mistakenly treated it as a new grievance and rejected it on different grounds, including an alleged PREA claim and multiple issues. Because the prison's grievance policy did not permit another resubmission, the court found that officials' processing error created a dead end that prevented further exhaustion.

PROCEDURAL HISTORY

Martinez filed suit on September 25, 2020, alleging constitutional violations arising from his confinement in a dry cell. Defendants' initial summary-judgment motion was denied without prejudice for additional discovery, and a renewed motion was later granted as to all claims and defendants except Martinez's Eighth Amendment claim against Berfield and Evans. After unsuccessful mediation and reassignment to Judge Mannion, the court held an evidentiary hearing on exhaustion and received supplemental briefs. The court concluded that administrative remedies were unavailable and scheduled the remaining claims for trial.

DISPOSITION

other

CASES CITED

- Thomas v. Tice, 948 F.3d 133, 137 (3d Cir. 2020)
- Downey v. Pa. Dep't of Corr., 968 F.3d 299, 305 (3d Cir. 2020)
- Woodford v. Ngo, 548 U.S. 81, 88, 93 (2006)
- Jones v. Bock, 549 U.S. 199, 216 (2007)
- Rinaldi v. United States, 904 F.3d 257, 266-68 (3d Cir. 2018)
- Ross v. Blake, 578 U.S. 632, 643-44 (2016)
- Paladino v. Newsome, 885 F.3d 203, 210 (3d Cir. 2018)
- Small v. Camden County, 728 F.3d 265, 271 (3d Cir. 2013)
- Shifflett v. Korszniak, 934 F.3d 356, 365 (3d Cir. 2019)
- Talley v. Clark, 111 F.4th 255, 263-64 (3d Cir. 2024)