

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA, FORT WAYNE DIVISION

Tyler S. Davis v. Brady Thomas, Z. Shifflett, and I. Taylor

Davis · No. 1:26-CV-113-GSL-AZ · Decided April 10, 2026

SUMMARY

The United States District Court for the Northern District of Indiana dismissed Tyler S. Davis’s amended prisoner complaint under 28 U.S.C. § 1915A. The court held that the alleged mishandling of a single item of legal mail did not state a constitutional claim and denied further leave to amend as futile.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana, Fort Wayne Division
WRITING FOR THE COURT	Gretchen S. Lund
JURISDICTION	United States District Court for the Northern District of Indiana
DECIDED	April 10, 2026
DOCKET	1:26-CV-113-GSL-AZ
DISPOSITION	dismissed
PROCEDURAL POSTURE	Screening of a prisoner's amended pro se complaint under 28 U.S.C. § 1915A.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915A, the court must review a prisoner's complaint and dismiss it if it is frivolous or malicious, fails to state a claim upon which relief may be granted, or seeks monetary relief from an immune defendant. Pro se pleadings are liberally construed.
PRECEDENTIAL VALUE	unknown
PARTIES	Tyler S. Davis v. Brady Thomas, Z. Shifflett, I. Taylor

TOPICS

- prisoners rights
- section 1983
- pleadings
- civil procedure
- first amendment

PRACTICE AREAS

- civil rights
- prisoner litigation
- civil procedure

QUESTIONS PRESENTED

1. Whether the amended complaint stated a constitutional claim based on the alleged mishandling of Davis's legal mail.
2. Whether Davis should be granted another opportunity to amend his complaint after his amended complaint failed to cure the deficiencies identified in the prior screening order.

HOLDINGS

1. The amended complaint failed to state a claim because it did not allege that the legal mail was specially marked as originating from an attorney and alleged only one instance of mishandling, which was insufficient to establish a constitutional violation.
2. Further leave to amend was properly denied because Davis had already received one opportunity to amend and the amendment did not cure the identified deficiencies; another amendment would be futile.

KEY QUOTATIONS

“We think it entirely appropriate that the State require any such communications to be specially marked as originating from an attorney, with his name and address being given, if they are to receive special treatment.”
(418 U.S. at 576)

“an isolated incident of mail tampering is usually insufficient to establish a constitutional violation. Rather, the inmate must show that prison officials regularly and unjustifiably interfered with the incoming legal mail.” (320 F.3d at 351)

“This complaint does not state a claim for which relief can be granted.”

FACTUAL BACKGROUND

Davis alleged that Officer I. Taylor gave legal mail from Davis's public defender to another inmate with the same last name at the DeKalb County Jail on January 26, 2026. The amended complaint did not state whether the mail was marked as originating from an attorney. It identified only this single incident of alleged mishandling of legal mail.

PROCEDURAL HISTORY

Davis, a prisoner proceeding without a lawyer, filed an amended complaint alleging that Officer I. Taylor gave his legal mail to another inmate. The court had previously screened the original complaint and granted Davis one opportunity to amend. After concluding that the amended complaint did not cure the previously identified deficiencies, the court dismissed the action under 28 U.S.C. § 1915A and denied further amendment as futile.

DISPOSITION

dismissed

CASES CITED

- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Wolff v. McDonnell, 418 U.S. 539, 576 (1974)
- Davis v. Goord, 320 F.3d 346, 351 (2d Cir. 2003)
- Willis v. Washington, 172 F.3d 54 (7th Cir. 1999)
- Kincaid v. Vail, 969 F.2d 594, 602 (7th Cir. 1992)
- Abu-Shawish v. United States, 898 F.3d 726, 738 (7th Cir. 2018)
- Russell v. Zimmer, Inc., 82 F.4th 564, 572 (7th Cir. 2023)

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