

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
ILLINOIS

Jordan Denzell v. Tara McCoy, et al.

Case No. 25-cv-00185-SPM (S.D. Ill. Apr. 1, 2026) · No. 25-cv-00185-SPM · Decided April 1, 2026

SUMMARY

The court denied Jordan Denzell’s motions for preliminary injunction concerning medical treatment for an elbow injury because he had been transferred from Menard Correctional Center and was no longer under the care of the defendants. The court also held that complaints about current medical care at Hill Correctional Center were outside the scope of the underlying action and involved nonparties. The court granted Denzell’s motion to substitute Morgan Giacomo and Nicole Brand for two previously unidentified defendants and extended the deadline to identify a third.

CASE DETAILS

COURT	United States District Court for the Southern District of Illinois
WRITING FOR THE COURT	Stephen P. McGlynn
JURISDICTION	United States District Court for the Southern District of Illinois
DECIDED	April 1, 2026
DOCKET	25-cv-00185-SPM
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for two preliminary injunctions in an ongoing prisoner civil-rights action under 42 U.S.C. § 1983. The court denied the injunction motions as moot and beyond the scope of the underlying complaint, granted plaintiff's motion to substitute two defendants for previously unidentified Jane Doe defendants, and extended the deadline to identify a third Doe defendant.
STANDARD OF REVIEW	A preliminary injunction must seek relief of the same character as that sought in the underlying action and concern a matter presented in that action. Injunctive relief directed at conditions specific to a prison becomes moot when the prisoner is transferred away from that prison and is no longer subject to the defendants' control.
PRECEDENTIAL VALUE	Unknown; memorandum and order from the United States District Court for the Southern District of Illinois

TOPICS

injunctions

prisoners rights

section 1983

civil procedure

constitutional law

PRACTICE AREAS

civil rights litigation

prisoner civil-rights litigation

federal civil procedure

QUESTIONS PRESENTED

1. Whether Denzell's requests for preliminary injunctions concerning medical treatment at Menard became moot after his transfer to Hill Correctional Center.
2. Whether the court could grant preliminary injunctive relief concerning alleged medical-care violations at Hill Correctional Center by medical staff who were not parties to the action.
3. Whether Morgan Giacomo and Nicole Brand should be substituted for Jane Doe 1 and Jane Doe 2 and whether the deadline to identify Jane Doe 3 should be extended.

HOLDINGS

1. The requests for preliminary injunctions were moot because Denzell was no longer housed at Menard or under the care and control of the defendants whose conduct was challenged.
2. The court could not grant a preliminary injunction concerning Denzell's current medical care at Hill because that conduct was outside the scope of the complaint and involved individual medical staff who were not parties to the case.
3. Morgan Giacomo was substituted for Jane Doe 1, Nicole Brand was substituted for Jane Doe 2, and the deadline to identify Jane Doe 3 was extended to April 22, 2026.

KEY QUOTATIONS

“a prisoner who seeks injunctive relief for a condition specific to a particular prison is transferred out of that prison, the need for relief, and hence the prisoner’s claim, become moot”

“A preliminary injunction “is appropriate only if it seeks relief of the same character sought in the underlying suit, and deals with a matter presented in that underlying suit.””

FACTUAL BACKGROUND

Denzell alleged that he injured his elbow in a bunk-bed fall at the Northern Receiving Center on September 11, 2023, and thereafter was denied adequate medical care at Menard Correctional Center. He alleged that McCoy and three nurses ignored sick-call requests, failed to provide effective pain medication, or otherwise failed to treat the injury. After he was transferred to Hill Correctional Center, Denzell sought an injunction requiring an x-ray, specialist examination, and physical therapy based on allegedly continuing inadequate care.

PROCEDURAL HISTORY

Denzell filed the § 1983 action on February 7, 2025, alleging inadequate medical care and retaliation concerning an elbow injury sustained in 2023. After screening under 28 U.S.C. § 1915A, three claims proceeded against

Tara McCoy and three Jane Doe defendants. After Denzell was transferred from Menard Correctional Center to Hill Correctional Center, he sought preliminary injunctions requiring additional medical evaluation and treatment. The court denied the injunction requests, granted substitution of Morgan Giacomo and Nicole Brand for Jane Does 1 and 2, and extended the identification deadline for Jane Doe 3.

DISPOSITION

other

CASES CITED

- Lehn v. Holmes, 364 F.3d 862, 871 (7th Cir. 2004)
- Higgason v. Farley, 83 F.3d 807 (7th Cir. 1995)
- Daniels v. Dumsdorff, No. 19-cv-00394, 2019 WL 3322344, at *1 (S.D. Ill. July 24, 2019)
- Hallows v. Madison County Jail, No. 18-cv-881-JPG, 2018 WL 2118082, at *6 (S.D. Ill. May 8, 2018)
- Devose v. Herrington, 42 F.3d 470, 471 (8th Cir. 1994)
- Bird v. Barr, 19-cv-1581 (KBJ), 2020 WL 4219784, at *2 (D.C. Cir. July 23, 2020)