

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Errick L. Young v. Alycia Lewis

Young v. Lewis · No. Civil Action No. 26-838 (JXN)(MAH) · Decided March 4, 2026

SUMMARY

The United States District Court for the District of New Jersey screened a pro se prisoner’s 42 U.S.C. § 1983 complaint alleging unconstitutional conditions of confinement at Bayside State Prison. The court granted in forma pauperis status and dismissed the complaint without prejudice because it alleged no facts establishing Defendant Alycia Lewis’s personal involvement or supervisory liability, while allowing thirty days to amend.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                        |
|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the District of New Jersey                                                                                                                                                                                                                                            |
| WRITING FOR THE COURT | Julien Xavier Neals                                                                                                                                                                                                                                                                                    |
| JURISDICTION          | United States District Court for the District of New Jersey                                                                                                                                                                                                                                            |
| DECIDED               | March 4, 2026                                                                                                                                                                                                                                                                                          |
| DOCKET                | Civil Action No. 26-838 (JXN)(MAH)                                                                                                                                                                                                                                                                     |
| DISPOSITION           | dismissed                                                                                                                                                                                                                                                                                              |
| PROCEDURAL POSTURE    | A prisoner proceeding pro se filed a 42 U.S.C. § 1983 complaint and an application to proceed in forma pauperis. The district court granted IFP status, screened the complaint under 28 U.S.C. §§ 1915(e)(2)(B) and 1915A, and dismissed the complaint without prejudice for failure to state a claim. |
| STANDARD OF REVIEW    | The court applied the Rule 12(b)(6) standard during mandatory screening under 28 U.S.C. §§ 1915(e)(2)(B) and 1915A, accepting well-pleaded allegations as true and determining whether the complaint alleged sufficient factual matter to state a facially plausible claim.                            |
| PRECEDENTIAL VALUE    | Nonprecedential; opinion marked not for publication.                                                                                                                                                                                                                                                   |
| PARTIES               | Errick L. Young v. Alycia Lewis                                                                                                                                                                                                                                                                        |

TOPICS

- section 1983
- prisoners rights
- cruel and unusual punishment
- motions to dismiss
- civil procedure

## PRACTICE AREAS

civil rights

constitutional law

prisoner litigation

civil procedure

## QUESTIONS PRESENTED

1. Whether the complaint stated a plausible Eighth Amendment conditions-of-confinement claim against the prison administrator under 42 U.S.C. § 1983.
2. Whether the complaint adequately alleged the defendant's personal involvement or supervisory liability under § 1983.
3. Whether the complaint should be dismissed during mandatory screening under 28 U.S.C. §§ 1915(e)(2)(B) and 1915A.

## HOLDINGS

1. A supervisor cannot be held liable under § 1983 solely because of the supervisor's position or respondeat superior; the plaintiff must allege facts showing personal involvement in the constitutional violation or that a policy or practice attributable to the supervisor directly caused the injury.
2. The complaint failed to state a plausible claim against Lewis because it did not allege sufficient facts establishing her personal involvement in, or responsibility for, the alleged Eighth Amendment violation.

## KEY QUOTATIONS

*"In other words, "[a] defendant in a civil rights action must have personal involvement in the alleged wrongs; liability cannot be predicated solely on the operation of respondeat superior." (III.A.i)*

*"The Complaint (ECF No. 1) is DISMISSED without prejudice. The Court shall give Plaintiff thirty (30) days to file an amended complaint to cure the deficiencies discussed above." (Conclusion)*

## FACTUAL BACKGROUND

Young was incarcerated at Bayside State Prison in New Jersey, where he alleged excessive heat, humidity, inadequate ventilation, broken fans and windows, contaminated air, and goose feces in prison courtyards. He sued Bayside's administrator, Alycia Lewis, under 42 U.S.C. § 1983, asserting an Eighth Amendment conditions-of-confinement claim and seeking monetary and injunctive relief. The complaint did not allege facts showing Lewis's personal participation, direction, contemporaneous knowledge, acquiescence, or responsibility for a policy or practice causing the conditions.

## PROCEDURAL HISTORY

Young alleged that heat, humidity, inadequate ventilation, contaminated air, and goose feces at Bayside State Prison violated the Eighth Amendment. He sued Lewis, the prison administrator, but alleged no facts connecting her personally to the conditions or showing that they resulted from a policy or practice attributable to her. The court granted leave to proceed in forma pauperis, dismissed the complaint without prejudice, and allowed thirty days to file an amended complaint.

## DISPOSITION

dismissed

#### CASES CITED

- Schreane v. Seana, 506 F. App'x 120, 122 (3d Cir. 2012)
- Courteau v. United States, 287 F. App'x 159, 162 (3d Cir. 2008)
- In re Burlington Coat Factory Sec. Litig., 114 F.3d 1410, 1420 (3d Cir. 1997)
- Fowler v. UPMC Shadyside, 578 F.3d 203, 210 (3d Cir. 2009)
- Belmont v. MB Investment Partners, Inc., 708 F.3d 470, 483 n.17 (3d Cir. 2013)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Mala v. Crown Bay Marina, Inc., 704 F.3d 239, 245 (3d Cir. 2013)
- West v. Atkins, 487 U.S. 42, 48 (1988)
- Graham v. Connor, 490 U.S. 386, 393-94 (1989)
- Nicini v. Morra, 212 F.3d 798, 806 (3d Cir. 2000)
- Rode v. Dellarciprete, 845 F.2d 1195, 1207 (3d Cir. 1988)
- Shaw by Strain v. Strackhouse, 920 F.2d 1135, 1147 (3d Cir. 1990)
- Doe v. New Jersey Department of Corrections, No. 14-5284, 2015 WL 3448233, at \*9 (D.N.J. May 29, 2015)
- Beers-Capitol v. Whetzel, 256 F.3d 120, 133-34 (3d Cir. 2001)
- Sample v. Diecks, 885 F.2d 1099, 1118 (3d Cir. 1989)
- Folk v. Prime Care Medical, 741 F. App'x 47, 51 (3d Cir. 2018)
- Butler v. Penchishen, No. 22-CV-3252, 2022 WL 4473590, at \*4 (E.D. Pa. Sept. 26, 2022)