

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Ruben C. Holton v. United States

Holton · No. 4:22-CV-00070 · Decided March 2, 2026

SUMMARY

The United States District Court for the Middle District of Pennsylvania adopted a magistrate judge’s report and recommendation and granted the United States’ motion for summary judgment. The court concluded that Holton failed to provide expert evidence supporting his professional negligence claim and failed to provide evidence sufficient to support his ordinary negligence claims concerning lingering COVID-19 symptoms allegedly arising from his incarceration at FCI Schuylkill.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Joseph F. Saporito, Jr.
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	March 2, 2026
DOCKET	4:22-CV-00070
DISPOSITION	other
PROCEDURAL POSTURE	The district court reviewed a magistrate judge's report and recommendation recommending that the United States's motion for summary judgment be granted. No timely objections were filed, and the district court independently reviewed the report and record before adopting the recommendation.
STANDARD OF REVIEW	Because no timely objections were filed, the plaintiff forfeited de novo review. The district court independently reviewed the report and record and applied clear-error review to the uncontested portions, giving reasoned consideration to the report and recommendation.
PRECEDENTIAL VALUE	Unknown; district court order adopting a report and recommendation

TOPICS

- summary judgment
- medical malpractice
- professional negligence
- negligence
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the report and recommendation recommending summary judgment for the United States should be adopted where the plaintiff filed no timely objections.
2. Whether the plaintiff could proceed on a professional-negligence claim without supporting expert testimony.
3. Whether the plaintiff produced sufficient evidence to create a genuine issue of material fact on his ordinary-negligence claims.

HOLDINGS

1. The plaintiff's failure to file timely objections forfeited de novo review, and the court reviewed the uncontested portions of the report and recommendation for clear error while giving them reasoned consideration.
2. Summary judgment was proper on the plaintiff's professional-negligence or medical-malpractice claim because he failed to provide supporting expert testimony or other expert evidence necessary to create a genuine issue of material fact.
3. Summary judgment was proper on the plaintiff's ordinary-negligence claims because he produced no evidence showing refused or delayed medical treatment, flawed treatment, or another government act supporting liability.

KEY QUOTATIONS

“Holton was required to produce his own supporting expert testimony. His failure to do so precludes him from succeeding on his medical negligence claim” (Doc. 63 at 30)

“Holton has not offered any expert evidence to create a genuine issue of fact concerning his professional negligence claim [] and no reasonable factfinder could find that the United States committed medical malpractice based on the existing record” (Doc. 63 at 36)

“Nothing in the record evinces any refusal to administer, or delays in administering[,] medical treatment, and Holton does not identify any evidence corroborating his claim. Nor does he explain, through evidence or otherwise, how the treatment he received was flawed or delayed...” (Doc. 63 at 43)

FACTUAL BACKGROUND

Ruben C. Holton alleged that he contracted COVID-19 and suffered lingering and permanent symptoms and pain of mind while housed at FCI Schuylkill. The record indicated that prison medical staff consistently treated his complaints. The government submitted expert evidence supporting summary judgment, while Holton did not provide supporting expert testimony for his professional-negligence claim or evidence showing that the government breached a duty through delayed, refused, or flawed treatment.

PROCEDURAL HISTORY

The plaintiff alleged ordinary and professional negligence arising from COVID-19 infection and lingering symptoms while incarcerated at FCI Schuylkill. The court previously granted the United States's motion for judgment on the pleadings in part and denied it in part, allowing certain negligence claims concerning lingering symptoms and pain of mind to proceed. Magistrate Judge Caraballo later recommended granting summary judgment because the plaintiff offered no necessary expert evidence for his professional-negligence claim and no evidence supporting his ordinary-negligence claims. The district court adopted the recommendation, granted summary judgment, directed entry of judgment for the United States, and closed the case.

DISPOSITION

other

CASES CITED

- 488 F.3d 187, 194 (3d Cir. 2007)
- 812 F.2d 874, 878-79 (3d Cir. 1987)
- 866 F.3d 93, 99 (3d Cir. 2017)