

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
MISSISSIPPI, NORTHERN DIVISION

Markcus J. Aaron v. Hinds County

Aaron v. Hinds County · No. 3:23-cv-3084-HTW-LGI · Decided December 31, 2025

SUMMARY

The United States Magistrate Judge recommends granting Hinds County’s motion for summary judgment in Markcus J. Aaron’s 42 U.S.C. § 1983 action alleging constitutionally inadequate medical care while detained at the Hinds County Detention Center. The recommendation concludes that Aaron failed to establish deliberate indifference, municipal liability under Monell, or a qualifying physical injury permitting recovery for mental or emotional damages under the Prison Litigation Reform Act. The parties were notified of their fourteen-day period to file objections.

CASE DETAILS

COURT	United States District Court for the Southern District of Mississippi, Northern Division
WRITING FOR THE COURT	LaKeysha Greer Isaac, United States Magistrate Judge
JURISDICTION	United States District Court for the Southern District of Mississippi, Northern Division
DECIDED	December 31, 2025
DOCKET	3:23-cv-3084-HTW-LGI
PROCEDURAL POSTURE	Report and recommendation on Hinds County's motion for summary judgment in a 42 U.S.C. § 1983 action alleging constitutionally inadequate medical care during pretrial detention.
STANDARD OF REVIEW	Summary judgment is appropriate when the movant shows that no genuine dispute as to any material fact exists and the movant is entitled to judgment as a matter of law. The court views facts and reasonable inferences in the light most favorable to the nonmovant, but conclusory allegations and unsubstantiated assertions are insufficient; once the movant satisfies its burden, the nonmovant must identify specific evidence showing a genuine issue for trial.
PARTIES	Markcus J. Aaron v. Hinds County

QUESTIONS PRESENTED

1. Whether Hinds County was entitled to summary judgment because Aaron failed to produce evidence of deliberate indifference to a serious medical need.
2. Whether Aaron established municipal liability under 42 U.S.C. § 1983 by identifying a Hinds County policy or custom that was the moving force behind a constitutional violation.
3. Whether the Prison Litigation Reform Act barred recovery of mental or emotional damages absent a specific physical injury.

HOLDINGS

1. The recommendation concludes that Aaron failed to produce evidence that Hinds County or its personnel refused to treat him, ignored his complaints, intentionally treated him incorrectly, or otherwise acted with deliberate indifference to a serious medical need.
2. The recommendation concludes that Hinds County was entitled to judgment because Aaron identified no official policy or custom and did not show that any such policy or custom was the moving force behind a constitutional violation.

FACTUAL BACKGROUND

Aaron was detained at the Hinds County Detention Center from February 11, 2019, until October 12, 2022, while awaiting or serving a criminal sentence, and he alleged that jail personnel inadequately treated his ulcerative colitis and related symptoms. His symptoms included vomiting, stomach pain, weakness, rectal bleeding, and difficulty eating; he also alleged that prescribed medications were not provided and that his medical records were not transferred to later custodians. The medical records showed repeated medical evaluations, specialist consultations, a colonoscopy, hospital treatment, laboratory work, chronic-care visits, and administration of numerous medications. Aaron testified that he suffered mental injuries but did not claim that Hinds County physically harmed him.

PROCEDURAL HISTORY

Aaron filed a pro se, in forma pauperis action under 42 U.S.C. § 1983 concerning medical treatment at the Hinds County Detention Center. After a Spears omnibus hearing, the magistrate judge permitted additional discovery. Hinds County moved for summary judgment, and Aaron did not respond. The magistrate judge recommends that the motion be granted, subject to the parties' fourteen-day period for objections and subsequent review by the district judge.