

UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT

Jaryan Gills v. Robert Hamilton

Gills · No. No. 24-2898 · Decided January 15, 2026

SUMMARY

The Seventh Circuit affirmed summary judgment for prison officials in Jaryan Gills’s 42 U.S.C. § 1983 action alleging unconstitutional cell conditions and inadequate medical care. The court upheld exclusion of Gills’s declarations under the sham affidavit rule and concluded that the evidence did not establish deliberate indifference or a conspiracy to violate his Eighth Amendment rights.

CASE DETAILS

COURT	United States Court of Appeals for the Seventh Circuit
WRITING FOR THE COURT	Kirsch, Circuit Judge; Brennan, Chief Judge; Jackson-Akiwumi, Circuit Judge
JURISDICTION	United States Court of Appeals for the Seventh Circuit
DECIDED	January 15, 2026
DOCKET	No. 24-2898
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff appealed from the grant of defendants' motions for summary judgment on federal claims under 42 U.S.C. § 1983 alleging Eighth Amendment violations arising from prison conditions, medical care, and an alleged conspiracy.
STANDARD OF REVIEW	Evidentiary rulings are reviewed for abuse of discretion; rulings on cross-motions for summary judgment are reviewed de novo, with the nonmoving party receiving the benefit of conflicting evidence and reasonable inferences.
PRECEDENTIAL VALUE	Published Seventh Circuit opinion; precedential
PARTIES	Jaryan Gills v. Robert Hamilton, Other defendants-appellees

TOPICS

- summary judgment
- prisoners rights
- cruel and unusual punishment
- section 1983
- evidence

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the district court properly disregarded Gills's declarations under the sham-affidavit rule and whether its failure to expressly address declarations from Gills's mother and a prison porter was harmless.
2. Whether the prison conditions, including intermittent denial of access to toilet and sink facilities, supported an Eighth Amendment conditions-of-confinement claim.
3. Whether Dr. Rankin and other prison officials were deliberately indifferent to Gills's objectively serious medical needs in violation of the Eighth Amendment.
4. Whether the defendants conspired to violate Gills's Eighth Amendment rights.

HOLDINGS

1. The district court did not abuse its discretion by disregarding Gills's declarations because they added significant factual details that contradicted or expanded his deposition testimony in an effort to manufacture disputes of fact and avoid summary judgment.
2. The district court's failure to expressly address the other declarations was harmless because, although the evidence should have been considered, it merely corroborated existing evidence and did not create a genuine dispute of material fact.
3. A prisoner must establish both objectively sufficiently serious conditions denying the minimal civilized measure of life's necessities and officials' subjective deliberate indifference. On this record, no reasonable jury could find that prison officials were deliberately indifferent because they took reasonable measures to mitigate Gills's intermittent lack of toilet and sink access.
4. Gills failed to present evidence from which a reasonable jury could find that Dr. Rankin or the other defendants were deliberately indifferent to an objectively serious medical condition.
5. Summary judgment was proper on the conspiracy claim because Gills could not establish an underlying constitutional violation and offered no non-speculative evidence that defendants agreed to violate his rights.

KEY QUOTATIONS

“the sham affidavit rule, which “prohibits a party from submitting an affidavit that contradicts the party’s prior deposition or other sworn testimony.”” (at 5)

“The Constitution mandates humane prisons, but not comfortable ones.” (at 6)

“While the EMCC’s guards may not have acted kindly towards Gills, on this record, no reasonable jury could conclude that they responded to his plight with deliberate indifference.” (at 8)

“Gills’s medical care while recovering from surgery may not have been everything he wanted (or everything that his surgeon recommended). But the evidence shows that Dr. Rankin performed his role at a level far above the Eighth Amendment’s standard for liability.” (at 11)

FACTUAL BACKGROUND

After another inmate broke Gills's arm at the East Moline Correctional Center, Gills underwent two surgeries and was placed for 31 days in a medical-segregation cell without a sink, toilet, or running water. He alleged that guards sometimes delayed or denied bathroom access, that he had to relieve himself in the cell, and that he received inadequate ice, showers, medication, physical therapy, and follow-up care. Gills also alleged that Dr. Rankin and other officials were deliberately indifferent to his medical needs and conspired to violate his constitutional rights.

PROCEDURAL HISTORY

Gills sued Dr. William Rankin and other prison officials in the United States District Court for the Central District of Illinois, asserting Eighth Amendment claims, a related conspiracy claim, and an Illinois intentional-infliction-of-emotional-distress claim. The parties filed cross-motions for summary judgment. The district court disregarded Gills's declarations, treated defendants' factual assertions as admitted, and granted defendants summary judgment. Gills appealed only as to his federal claims.

DISPOSITION

affirmed

CASES CITED

- *Torres v. Madrid*, 592 U.S. 306, 309 (2021)
- *United States v. Trudeau*, 812 F.3d 578, 590 (7th Cir. 2016)
- *Cent. States, Se. and Sw. Areas Pension Fund v. Univar Sols. USA Inc.*, 148 F.4th 426, 429 (7th Cir. 2025)
- *Waukegan Potawatomi Casino, LLC v. City of Waukegan*, 128 F.4th 871, 873 (7th Cir. 2025)
- *Stockton v. Milwaukee County*, 44 F.4th 605, 614 (7th Cir. 2022)
- *James v. Hale*, 959 F.3d 307, 314-15 (7th Cir. 2020)
- *Clacks v. Kwik Trip, Inc.*, 108 F.4th 950, 956 (7th Cir. 2024)
- *Rhodes v. Chapman*, 452 U.S. 337, 349-52 (1981)
- *Farmer v. Brennan*, 511 U.S. 825, 834, 837, 847 (1994)
- *Thomas v. Blackard*, 2 F.4th 716, 719-21 (7th Cir. 2021)
- *Jaros v. Ill. Dep't of Corr.*, 684 F.3d 667, 669-71 (7th Cir. 2012)
- *Hardeman v. Curran*, 933 F.3d 816, 820 (7th Cir. 2019)
- *Taylor v. Riojas*, 592 U.S. 7, 7-10 (2020)
- *Vinning-El v. Long*, 482 F.3d 923, 924-25 (7th Cir. 2007)
- *Williams v. Shah*, 972 F.3d 476, 479 n.1 (7th Cir. 2019)
- *Jackson v. Esser*, 105 F.4th 948, 961 (7th Cir. 2024)
- *Johnson v. Dominguez*, 5 F.4th 818, 825 (7th Cir. 2021)
- *Vance v. Peters*, 97 F.3d 987, 992-94 (7th Cir. 1996)
- *Giles v. Godinez*, 914 F.3d 1040, 1049 (7th Cir. 2019)

- Mitchell v. Kallas, 895 F.3d 492, 500 (7th Cir. 2018)
- Aguilar v. Gaston-Camara, 861 F.3d 626, 630 (7th Cir. 2017)
- Walker v. Wexford Health Sources, Inc., 940 F.3d 954, 964-66 (7th Cir. 2019)
- Archer v. Chrisholm, 870 F.3d 603, 620 (7th Cir. 2017)
- Beaman v. Freesmeyer, 776 F.3d 500, 510-11 (7th Cir. 2015)
- Mwangangi v. Nielsen, 48 F.4th 816, 832 (7th Cir. 2022)