

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
ILLINOIS, SPRINGFIELD DIVISION

Adrian Ramirez-Alcantar v. Joshua McDannald

Ramirez-Alcantar · No. 3:25-cv-03388-JEH · Decided April 29, 2026

SUMMARY

The United States District Court for the Central District of Illinois conducts a merit review under 28 U.S.C. § 1915A of Adrian Ramirez-Alcantar’s amended § 1983 complaint concerning his inability to attend a state post-conviction hearing by video. The court permits a First Amendment access-to-courts claim to proceed against four facility staff members, dismisses claims against the warden and a major without prejudice, dismisses the Illinois Department of Corrections with prejudice, and denies appointed counsel. The order also addresses service, pleading, discovery, and case-management procedures.

CASE DETAILS

COURT	United States District Court for the Central District of Illinois, Springfield Division
WRITING FOR THE COURT	Jonathan E. Hawley
JURISDICTION	United States District Court for the Central District of Illinois, Springfield Division
DECIDED	April 29, 2026
DOCKET	3:25-cv-03388-JEH
DISPOSITION	other
PROCEDURAL POSTURE	Merit review of a prisoner's amended complaint under 28 U.S.C. § 1915A. The court screened the pleading, allowed a First Amendment access-to-courts claim to proceed against four defendants, dismissed other defendants, and denied the plaintiff's request for appointed counsel.
STANDARD OF REVIEW	At § 1915A screening, the court accepted factual allegations as true and liberally construed them in the plaintiff's favor, but disregarded conclusory statements and required allegations sufficient to state a plausible claim for relief. The court applied the Rule 12(b)(6) failure-to-state-a-claim standard.
PRECEDENTIAL VALUE	nonprecedential

PARTIES

Adrian Ramirez-Alcantar v. Joshua McDannald, Nancy Jacoby, Jacob Keeling, Sergeant Taylor, Major Joyce, John Doe 1, Illinois Department of Corrections

TOPICS

section 1983 prisoners rights first amendment civil rights pleadings

PRACTICE AREAS

prisoner civil rights constitutional law federal civil procedure post-conviction access to courts

QUESTIONS PRESENTED

1. Whether the amended complaint plausibly alleged that prison officials denied the plaintiff access to the courts by failing to facilitate his attendance at a post-conviction hearing.
2. Whether the allegations stated a § 1983 claim against the warden based only on alleged failures to train or supervise subordinate employees.
3. Whether the allegations stated a constitutional claim against Major Joyce based on her alleged failure to follow up on a possible rescheduling of the writ.
4. Whether the Illinois Department of Corrections was a person subject to suit under § 1983 and whether it was protected by Eleventh Amendment immunity.
5. Whether the plaintiff was entitled to appointed counsel in the civil action.

HOLDINGS

1. The complaint stated a First Amendment access-to-the-courts claim against Nancy Jacoby, Jacob Keeling, Sergeant Taylor, and John Doe 1 because the alleged failure to coordinate the plaintiff's appearance at the September 20, 2024, hearing plausibly caused an actual injury to his nonfrivolous post-conviction proceeding.
2. The complaint failed to state a claim against Warden Joshua McDannald because it alleged no personal involvement or facts showing that he was deliberately reckless, aware of, or condoned the alleged misconduct.
3. The complaint failed to state a constitutional claim against Major Joyce because the sparse allegation that she said she would inquire about rescheduling the writ and did not follow up did not plausibly establish a constitutional deprivation.
4. The Illinois Department of Corrections was dismissed with prejudice because it is not a person subject to suit under § 1983 and is protected by Eleventh Amendment immunity from suits for money damages.
5. The motion for appointed counsel was denied because, although the plaintiff made a reasonable effort to obtain counsel, he appeared competent to litigate the case himself at its early stage.

KEY QUOTATIONS

“Plaintiff’s allegations are sufficient to proceed on a First Amendment claim for denial of access to the courts against Defendants Taylor, Jacoby, John Doe 1, and Keeling.” (Section III)

“There is no respondeat superior under § 1983.” (Section III)

“There is no right to court-appointed counsel in federal civil litigation.” (Section IV)

FACTUAL BACKGROUND

Ramirez-Alcantar was incarcerated at Taylorville Correctional Center and had a pending post-conviction petition in Kane County Circuit Court. Although writs were issued for his appearance at hearings, he alleged that prison staff failed to coordinate his attendance at hearings on July 19, August 23, and September 20, 2024. On September 20, he went to the designated facility location but was sent back to his housing unit after staff learned that the video-writ coordinator was absent; the state court then denied his post-conviction petition in his absence.

PROCEDURAL HISTORY

Ramirez-Alcantar filed an amended complaint under 42 U.S.C. § 1983 alleging that prison officials failed to facilitate his attendance at a state post-conviction hearing. On merit review, the court found the allegations sufficient to proceed against Jacoby, Keeling, Sergeant Taylor, and John Doe 1, dismissed McDannald and Major Joyce without prejudice, dismissed IDOC with prejudice, and denied the motion for appointed counsel. The case was directed to proceed to service.

DISPOSITION

other

CASES CITED

- Turley v. Rednour, 729 F.3d 645, 649-51 (7th Cir. 2013)
- Alexander v. United States, 721 F.3d 418, 422 (7th Cir. 2013)
- Wilson v. Ryker, 451 F. App'x 588, 589 (7th Cir. 2011)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bridges v. Gilbert, 557 F.3d 541, 553 (7th Cir. 2009)
- Cruz v. Beto, 405 U.S. 319, 321 (1972)
- Johnson v. Avery, 393 U.S. 483, 485 (1969)
- Lewis v. Casey, 518 U.S. 343, 355 (1996)
- Harbaugh v. Scott, No. 19-4240, 2020 WL 1917831, at *3 (C.D. Ill. Apr. 20, 2020)
- Ortiz v. Downey, 561 F.3d 664, 671 (7th Cir. 2009)
- John Doe v. Purdue University, Doe v. Purdue University, 928 F.3d 652, 664 (7th Cir. 2019)
- Vance v. Peters, 97 F.3d 987, 991 (7th Cir. 1996)
- Vance v. Rumsfeld, 701 F.3d 193, 203-05 (7th Cir. 2012) (en banc)
- Sanville v. McCaughtry, 266 F.3d 724, 740 (7th Cir. 2001)

- Thomas v. Cook County Sheriff's Department, 604 F.3d 293, 303 (7th Cir. 2010)
- Will v. Michigan Department of State Police, 491 U.S. 58, 71 (1989)
- Wynn v. Southward, 251 F.3d 588, 592 (7th Cir. 2001)
- Olson v. Morgan, 750 F.3d 708, 711 (7th Cir. 2014)
- Pruitt v. Mote, 503 F.3d 647, 655 (7th Cir. 2007)
- Bracey v. Grondin, 712 F.3d 1012, 1018 n.3 (7th Cir. 2013)
- Navejar v. Igiola, 718 F.3d 692, 696 (7th Cir. 2013)
- Watts v. Kidman, 42 F.4th 755, 764 (7th Cir. 2022)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/federal/united-states-district-court-for-the-central-district-of-ill/2026/adrian-ramirez-alcantar-v-joshua-mcdannald-buo87d8b>