

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
WISCONSIN

Quaa’sheem A. Chambers v. Matthew Miles

Chambers v. Miles · No. 25-CV-1024 · Decided February 19, 2026

SUMMARY

The United States District Court for the Eastern District of Wisconsin granted Defendant Matthew Miles’s motion to dismiss a Fourteenth Amendment excessive-force claim brought by self-represented Plaintiff Quaa’sheem A. Chambers. The court concluded that the alleged failure to remove Chambers’s restraints was negligence rather than purposeful, knowing, or reckless use of force, and also granted the motion as a sanction for Chambers’s failure to respond to the motion.

CASE DETAILS

COURT	United States District Court for the Eastern District of Wisconsin
WRITING FOR THE COURT	Tighe, United States Magistrate Judge
JURISDICTION	United States District Court for the Eastern District of Wisconsin
DECIDED	February 19, 2026
DOCKET	25-CV-1024
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendant moved to dismiss the Fourteenth Amendment excessive-force claim for failure to state a claim. Plaintiff did not timely respond, and the court independently reviewed the complaint and granted the motion.
STANDARD OF REVIEW	The court reviewed the complaint under the failure-to-state-a-claim standard and accepted the alleged facts for purposes of the motion. It also independently reviewed the complaint under the local-rule briefing requirements.
PRECEDENTIAL VALUE	unpublished district court decision; nonprecedential
PARTIES	Quaa’sheem A. Chambers v. Matthew Miles

TOPICS

- motions to dismiss
- fourteenth amendment
- prisoners rights
- section 1983
- sanctions

PRACTICE AREAS

prisoner civil rights

constitutional torts

civil procedure

QUESTIONS PRESENTED

1. Whether the complaint stated a Fourteenth Amendment excessive-force claim against Officer Miles based on the alleged failure to remove Chambers's restraints before placing him in a cell overnight.
2. Whether the complaint stated a claim against Officer Miles for the conduct of other officers who allegedly failed to respond to Chambers's medical-call-button requests after Miles left the jail.
3. Whether Chambers's failure to respond to the motion justified granting the motion as a sanction under the Eastern District of Wisconsin's local rules.

HOLDINGS

1. The complaint failed to state a Fourteenth Amendment excessive-force claim because the alleged failure to remove Chambers's restraints amounted at most to negligence and did not allege that Officer Miles purposely or knowingly used force, or acted with reckless intent to cause harm.
2. The complaint did not state a claim against Officer Miles based on other officers' alleged failure to remove the restraints after Miles clocked out because liability depends on each defendant's own knowledge and actions.
3. The court found sufficient cause under the local rules to grant the motion as a sanction because Chambers failed to respond to the motion within the required briefing period.

KEY QUOTATIONS

“Liability depends on each defendant's knowledge and actions, not on the knowledge or actions of [others].”

“But if a plaintiff does plead particulars [in his complaint], and they show that he has no claim, then he is out of luck—he has pleaded himself out of court.”

FACTUAL BACKGROUND

Chambers alleged that on March 28, 2025, Officer Miles placed him in a Milwaukee County Jail cell without removing his restraints. Miles allegedly stated that another correctional officer would remove the restraints because Miles's shift was ending. Chambers alleged that his medical-call-button requests at 11:25 p.m., 12:25 a.m., 12:50 a.m., and 1:05 a.m. were ignored. The court characterized the alleged failure to remove the restraints as negligence rather than purposeful, knowing, or reckless use of force by Miles.

PROCEDURAL HISTORY

Chambers filed a complaint alleging that Correctional Officer Matthew Miles failed to ensure that Chambers's restraints were removed before Chambers was placed in a Milwaukee County Jail cell overnight. Miles moved to dismiss on January 20, 2026. Chambers did not timely respond, and the court granted the motion both on the merits and as a sanction for failure to comply with the local briefing rules, dismissing the case.

DISPOSITION

dismissed

CASES CITED

- Kingsley v. Henderickson, 576 U.S. 389, 396-97 (2015)
- Burks v. Raemisch, 555 F.3d 592, 593-94 (7th Cir. 2009)
- Thomas v. Farley, 31 F.3d 557, 558-59 (7th Cir. 1994)

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