

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Mark A. Swift v. PrimeCare, Inc., et al.

Swift · No. 3:25-CV-02132 · Decided December 19, 2025

SUMMARY

The United States District Court for the Middle District of Pennsylvania screens Mark A. Swift’s pro se 42 U.S.C. § 1983 complaint alleging inadequate medical care while detained at York County Prison. The court permits a Fourteenth Amendment medical-care claim to proceed against Nurse Katelyn, dismisses the remaining claims, and denies without prejudice the requests for appointed counsel and preliminary injunctive relief.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Karoline Mehalchick
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	December 19, 2025
DOCKET	3:25-CV-02132
DISPOSITION	other
PROCEDURAL POSTURE	Screening of a pro se pretrial detainee's prisoner civil-rights complaint under 28 U.S.C. § 1915A and § 1915(e)(2), together with motions for appointment of counsel and preliminary injunctive relief.
STANDARD OF REVIEW	On mandatory screening under 28 U.S.C. § 1915A and § 1915(e)(2), the court applied the Rule 12(b)(6) standard, accepting well-pleaded factual allegations as true, drawing reasonable inferences in the plaintiff's favor, disregarding conclusory allegations, and determining whether the complaint plausibly stated a claim.
PRECEDENTIAL VALUE	unpublished district court memorandum; persuasive only

TOPICS

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

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Swift plausibly stated a Fourteenth Amendment claim for deliberate indifference to serious medical needs against Nurse Katelyn.
2. Whether the complaint stated a § 1983 claim against PrimeCare, Inc., supervisory defendants, and unidentified defendants.
3. Whether Swift was entitled to appointment of counsel at the preliminary stage of the civil action.
4. Whether Swift was entitled to preliminary injunctive relief concerning an alleged housing dispute with a correctional officer.

HOLDINGS

1. The complaint plausibly stated a Fourteenth Amendment claim against Nurse Katelyn because it alleged a serious medical need, deliberate indifference through denial or prevention of medical treatment, and resulting harm.
2. The complaint did not state viable § 1983 claims against PrimeCare, the supervisory defendants, or the unidentified defendants.
3. Swift was not entitled to appointed counsel at this stage, and his motion was denied without prejudice.
4. Swift was not entitled to a preliminary injunction concerning the alleged housing dispute, and the motion was denied without prejudice.

KEY QUOTATIONS

“Because Swift is a pretrial detainee, his claims of inadequate medical care fall under the Fourteenth Amendment, rather than the Eighth Amendment.” (Section III.A)

“Swift will be permitted to proceed on a Fourteenth Amendment claim against Nurse Katelyn premised on the alleged denial of medical care, but all other claims will be dismissed, and his requests for appointment of counsel and preliminary injunctive relief will be denied without prejudice.” (Section IV)

FACTUAL BACKGROUND

Swift was a pretrial detainee at York County Prison who alleged that he was not timely treated after reporting swelling and numbness, later lost consciousness, and was hospitalized for a stroke. After returning to prison, he repeatedly sought medical attention for allegedly low sodium levels and continuing swelling and numbness in his legs. He alleged that Nurse Katelyn repeatedly sent him back to his housing unit, recommended that he eat more salt, and instructed prison staff not to send him to medical again.

PROCEDURAL HISTORY

Mark A. Swift filed a pro se complaint under 42 U.S.C. § 1983 alleging inadequate medical care at York County Prison, along with an application to proceed in forma pauperis, a motion for appointment of counsel, and a motion for preliminary injunctive relief. Before service of process, the district court screened the complaint,

allowed a Fourteenth Amendment medical-care claim to proceed against Nurse Katelyn, dismissed the remaining claims, and denied the motions for counsel and preliminary injunctive relief without prejudice.

DISPOSITION

other

CASES CITED

- Atwell v. Lavan, 557 F. Supp. 2d 532, 554 (M.D. Pa. 2008)
- O'Connell v. Williams, 241 F. App'x 55 (3d Cir. 2007)
- James v. Pennsylvania Department of Corrections, 230 F. App'x 195, 197 (3d Cir. 2007)
- Mitchell v. Dodrill, 696 F. Supp. 2d 454, 471 (M.D. Pa. 2010)
- Banks v. County of Allegheny, 568 F. Supp. 2d 579, 588 (W.D. Pa. 2008)
- Burtch v. Milberg Factors, Inc., 662 F.3d 212, 221 (3d Cir. 2011)
- Tellabs, Inc. v. Makor Issues & Rights, Ltd., 551 U.S. 308, 322 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555 (2007)
- Morse v. Lower Merion School District, 132 F.3d 902, 906 (3d Cir. 1997)
- In re Burlington Coat Factory Securities Litigation, 114 F.3d 1410, 1429-30 (3d Cir. 1997)
- Palakovic v. Wetzel, 854 F.3d 209, 219-20 (3d Cir. 2017)
- Sheridan v. NGK Metals Corp., 609 F.3d 239, 262 n.27 (3d Cir. 2010)
- Jordan v. Fox, Rothschild, O'Brien & Frankel, 20 F.3d 1250, 1261 (3d Cir. 1994)
- Schuchardt v. President of the United States, 839 F.3d 336, 347 (3d Cir. 2016)
- Estelle v. Gamble, 429 U.S. 97, 106 (1976)
- Haines v. Kerner, 404 U.S. 519, 520-21 (1972)
- Grayson v. Mayview State Hospital, 293 F.3d 103, 108 (3d Cir. 2002)
- City of Oklahoma City v. Tuttle, 471 U.S. 808, 816 (1985)
- Mark v. Borough of Hatboro, 51 F.3d 1137, 1141 (3d Cir. 1995)
- Rode v. Dellarciprete, 845 F.2d 1195, 1207 (3d Cir. 1988)
- Dooley v. Wetzel, 957 F.3d 366, 374 (3d Cir. 2020)
- Natale v. Camden County Correctional Facility, 318 F.3d 575, 581 (3d Cir. 2003)
- Thomas v. City of Harrisburg, 88 F.4th 275, 281 n.23 (3d Cir. 2023)
- Durham v. Kelley, 82 F.4th 217, 229 (3d Cir. 2023)
- Rouse v. Plantier, 182 F.3d 192, 197 (3d Cir. 1999)
- White v. Napoleon, 897 F.2d 103, 109 (3d Cir. 1990)
- Montanez v. Price, 154 F.4th 127, 142 (3d Cir. 2025)
- Monell v. Department of Social Services of the City of New York, 436 U.S. 658 (1978)
- Brooks v. Beard, 167 F. App'x 923, 925 (3d Cir. 2006)

- Parham v. Johnson, 126 F.3d 454, 456-57 (3d Cir. 1997)
- Tabron v. Grace, 6 F.3d 147, 153, 155-58 (3d Cir. 1993)
- Montgomery v. Pinchak, 294 F.3d 492, 499 (3d Cir. 2002)
- Smith-Bey v. Petsock, 741 F.2d 22, 26 (3d Cir. 1984)
- Woodham v. Sayre Borough Police Department, 191 F. App'x 111, 116 (3d Cir. 2006)
- Ball v. Famiglio, 396 F. App'x 836, 837 (3d Cir. 2010)
- Doe v. Boyertown Area School District, 897 F.3d 518, 526 (3d Cir. 2018)

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