

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MISSOURI, SOUTHEASTERN DIVISION

Jeffery L. Anderson v. Joseph T. Hernandez, et al.

Anderson · No. 1:23-cv-00201-SNLJ · Decided March 17, 2026

SUMMARY

The United States District Court for the Eastern District of Missouri granted defendants’ motion for summary judgment based on qualified immunity in Jeffery L. Anderson’s 42 U.S.C. § 1983 action. The court held that Anderson could not establish the defendants’ personal involvement in the alleged delay of his psychotropic medication and had not provided verifying medical evidence of a detrimental effect from the delay. The court also noted that defendants withdrew their failure-to-exhaust defense.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Southeastern Division
WRITING FOR THE COURT	Stephen N. Limbaugh, Jr.
JURISDICTION	United States District Court for the Eastern District of Missouri, Southeastern Division
DECIDED	March 17, 2026
DOCKET	1:23-cv-00201-SNLJ
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff brought a 42 U.S.C. § 1983 deliberate-indifference claim concerning an alleged delay in receiving psychotropic medication. After discovery, defendants moved for summary judgment based on failure to exhaust administrative remedies and qualified immunity. The court previously denied summary judgment on exhaustion and deferred qualified immunity; defendants later withdrew the exhaustion defense, and the court granted summary judgment on qualified immunity.
STANDARD OF REVIEW	Summary judgment is appropriate under Federal Rule of Civil Procedure 56(a) when there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The court views the evidence and reasonable inferences in the light most favorable to the nonmoving party. Qualified immunity requires

	consideration of whether the defendant violated a constitutional right and whether that right was clearly established.
PRECEDENTIAL VALUE	Unpublished federal district court memorandum and order; generally nonprecedential.
PARTIES	Jeffery L. Anderson v. Joseph T. Hernandez, et al.

TOPICS

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QUESTIONS PRESENTED

1. Whether defendants were entitled to qualified immunity because plaintiff could not establish their personal involvement in the alleged delay of his medication.
2. Whether defendants were entitled to qualified immunity because plaintiff lacked verifying medical evidence of a detrimental effect caused by the alleged delay.
3. Whether summary judgment was appropriate under Federal Rule of Civil Procedure 56.

HOLDINGS

1. A § 1983 plaintiff must establish that each defendant personally participated in the alleged constitutional violation; supervisory responsibility alone is insufficient. Because plaintiff admitted that he sued defendants solely based on their supervisory roles and had no evidence that they knew of or participated in the medication delay, he could not establish a constitutional violation by these defendants.
2. A pretrial detainee alleging deliberate indifference based on delayed medical treatment must provide verifying medical evidence showing a detrimental effect caused by the delay. Plaintiff's failure to produce such evidence meant he could not establish a constitutional violation.
3. Defendants were entitled to qualified immunity because plaintiff failed to establish a violation of a constitutional right; it was therefore unnecessary to reach whether the right was clearly established.

KEY QUOTATIONS

"Unless both of these questions are answered affirmatively, [a defendant] is entitled to qualified immunity."

"A claim under § 1983 requires proof that each defendant "personally violated the plaintiff's constitutional rights.""

"When a deliberate indifference claim is based on an alleged delay in medical treatment, the plaintiff must "place verifying medical evidence in the record to show there was a detrimental effect caused by the delay.""

FACTUAL BACKGROUND

Plaintiff was a pretrial detainee at the Scott County Jail and alleged that psychotropic medication was delayed from February 4 to February 19, 2019. He testified that he sued the defendants because of their supervisory positions, had not communicated with either defendant during the relevant period, and did not know of any personal involvement by them in the alleged delay. He also had no medical-provider evidence showing that the fifteen-day delay caused a detrimental effect on his health.

PROCEDURAL HISTORY

Following screening under 28 U.S.C. § 1915A, plaintiff proceeded on a claim against defendants Wes Drury and Amy Johnson alleging deliberate indifference to serious medical needs. Defendants moved for summary judgment. The court found factual disputes regarding exhaustion, deferred the qualified-immunity issue, and held an evidentiary hearing on March 17, 2026. Defendants withdrew the exhaustion defense, and the court granted their motion for summary judgment based on qualified immunity.

DISPOSITION

other

CASES CITED

- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248 (1986)
- Allard v. Baldwin, 779 F.3d 768, 771 (8th Cir. 2015)
- Celotex Corp. v. Catrett, 477 U.S. 317, 323 (1986)
- Farver v. McCarthy, 931 F.3d 808, 811 (8th Cir. 2019)
- Beck v. Skon, 253 F.3d 330, 333 (8th Cir. 2001)
- Dean v. Bearden, 79 F.4th 986, 988 (8th Cir. 2023)
- Burns v. Cole, 18 F.4th 1003, 1007 (8th Cir. 2021)
- Jackson v. Nixon, 747 F.3d 537, 543 (8th Cir. 2014)
- Madewell v. Roberts, 909 F.2d 1203, 1208 (8th Cir. 1990)
- Keeper v. King, 130 F.3d 1309, 1314 (8th Cir. 1997)
- Jones v. City of St. Louis, 104 F.4th 1043, 1050 (8th Cir. 2024)
- Boyd v. Knox, 47 F.3d 966, 968 (8th Cir. 1995)
- Smith v. Lisenbe, 73 F.4th 596, 600 (8th Cir. 2023)
- Cheeks v. Belmar, 80 F.4th 872, 878 (8th Cir. 2023)
- Hancock v. Arnott, 39 F.4th 482, 487 (8th Cir. 2022)
- Jackson v. Riebold, 815 F.3d 1114, 1120 (8th Cir. 2016)

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