

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
NEW YORK

Michael Fields v. Rikers Island DOC; Bob Barker Company Inc.

No. 1:25-cv-07062 (LLS) (S.D.N.Y. Nov. 20, 2025) · No. 1:25-cv-07062 (LLS) · Decided November 25, 2025

SUMMARY

The United States District Court for the Southern District of New York dismissed Michael Fields’s pro se 42 U.S.C. § 1983 complaint challenging the mattress conditions at the Otis Bantum Correctional Center on Rikers Island. The court held that Bob Barker Company, Inc. was not alleged to be a state actor and that Rikers Island and the New York City Department of Correction were not proper defendants under § 1983. The court also found that the complaint did not plausibly allege an unconstitutional condition of confinement, but granted Fields 30 days to file an amended complaint.

CASE DETAILS

COURT	United States District Court for the Southern District of New York
WRITING FOR THE COURT	Louis L. Stanton
JURISDICTION	United States District Court for the Southern District of New York
DECIDED	November 25, 2025
DOCKET	1:25-cv-07062 (LLS)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se pretrial detainee brought an in forma pauperis action under 42 U.S.C. § 1983 challenging the conditions of confinement at the Otis Bantum Correctional Center on Rikers Island. The district court screened the complaint under the Prison Litigation Reform Act and dismissed it for failure to state a claim, granting 30 days' leave to amend.
STANDARD OF REVIEW	Under 28 U.S.C. §§ 1915(e)(2)(B) and 1915A(b), the court screened the in forma pauperis prisoner complaint and dismissed claims that were frivolous, malicious, failed to state a claim, or sought relief from an immune defendant. The court accepted well-pleaded factual allegations as true, construed the pro se pleading liberally, and applied the Rule 8 and facial-plausibility standard.
PRECEDENTIAL VALUE	Unknown; district court order with no reporter citation

TOPICS

section 1983 prisoners rights due process pleadings civil procedure

PRACTICE AREAS

Civil procedure Prisoner civil rights Constitutional law Section 1983 litigation Pleading and screening

QUESTIONS PRESENTED

1. Whether the private mattress supplier could be held liable under 42 U.S.C. § 1983.
2. Whether Rikers Island or the New York City Department of Correction could be sued as a person or entity under § 1983.
3. Whether the complaint plausibly alleged a Fourteenth Amendment conditions-of-confinement claim based on the DOC-issued mattress.
4. Whether Plaintiff should be granted leave to amend the pro se complaint.

HOLDINGS

1. A private company that is not alleged to act under color of state law cannot be held liable under § 1983. Because Bob Barker Company Inc. was alleged only to have supplied mattresses and not to have acted for a state or governmental body, the claims against it were dismissed for failure to state a claim.
2. Rikers Island is not a person subject to suit under § 1983, and the New York City Department of Correction is not a suable entity separate from the City of New York. Any claim against the City would require allegations that a municipal policy, practice, or custom caused the constitutional violation.
3. The complaint failed to plausibly allege a Fourteenth Amendment conditions-of-confinement claim because it did not show either that the mattress created or posed an unreasonable risk of serious damage to Plaintiff's health or that correctional officials intentionally or recklessly disregarded a known excessive risk.
4. A pro se plaintiff must generally be given an opportunity to amend when a liberal reading of the complaint indicates that a valid claim might be stated, unless amendment would be futile. Plaintiff was granted 30 days to amend.

KEY QUOTATIONS

“The Court is obliged to construe pro se pleadings liberally, Harris v. Mills, 572 F.3d 66, 72 (2d Cir. 2009), and interpret them to raise the “strongest [claims] that they suggest,”” (Standard of Review)

“Simply alleging that a mattress is uncomfortable is insufficient to ‘show that the conditions . . . pose an unreasonable risk of serious damage to [the plaintiff’s] health.’” (Discussion C)

“The Court dismisses the complaint, filed IFP under 28 U.S.C. § 1915(a)(1), for failure to state a claim on which relief may be granted, see 28 U.S.C. § 1915(e)(2)(B)(ii), with 30 days’ leave to replead.” (Conclusion)

FACTUAL BACKGROUND

Plaintiff was detained at the Otis Bantum Correctional Center on Rikers Island and alleged that a DOC-issued mattress caused lower-back pain and spasms beginning April 19, 2025. He alleged that he complained to DOC personnel, including captains, deputies, and nurses, and learned that other detainees had back problems. He relied on a mattress manufacturer's tag stating that the mattress was not intended for a foundation and sought compensation for pain and emotional suffering.

PROCEDURAL HISTORY

Plaintiff initially filed this action with 18 other plaintiffs. The claims were severed, and this separate civil action was opened for Plaintiff. After Plaintiff submitted an in forma pauperis application and prisoner authorization, the court screened the complaint and dismissed the claims against Bob Barker Company Inc. and Rikers Island/DOC, as well as the conditions-of-confinement claim, while granting leave to replead.

DISPOSITION

dismissed

CASES CITED

- *Abbas v. Dixon*, 480 F.3d 636, 639 (2d Cir. 2007)
- *Harris v. Mills*, 572 F.3d 66, 72 (2d Cir. 2009)
- *Triestman v. Fed. Bureau of Prisons*, 470 F.3d 471, 474-75 (2d Cir. 2006)
- *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 555, 570 (2007)
- *Ashcroft v. Iqbal*, 556 U.S. 662, 678-79 (2009)
- *Sykes v. Bank of Am.*, 723 F.3d 399, 406 (2d Cir. 2013)
- *Brentwood Acad. v. Tenn. Secondary Sch. Athletic Ass'n*, 531 U.S. 288, 295 (2001)
- *Ciambriello v. Cnty. of Nassau*, 292 F.3d 307, 323 (2d Cir. 2002)
- *Rodriguez v. City of New York*, No. 14-CV-5172, 2014 WL 4629034, at *2 (E.D.N.Y. Sept. 12, 2014)
- *Walker v. Schriro*, No. 11-CV-9299 (JPO), 2013 WL 1234930, at *16 (S.D.N.Y. Mar. 26, 2013)
- *Jenkins v. City of New York*, 478 F.3d 76, 93 n.19 (2d Cir. 2007)
- *Emerson v. City of New York*, 740 F. Supp. 2d 385, 396 (S.D.N.Y. 2010)
- *Connick v. Thompson*, 563 U.S. 51, 60 (2011)
- *Jones v. Town of East Haven*, 691 F.3d 72, 80 (2d Cir. 2012)
- *Darnell v. Pineiro*, 849 F.3d 17, 29-35 (2d Cir. 2017)
- *Walker v. Schult*, 717 F.3d 119, 125 (2d Cir. 2013)
- *LaReau v. MacDougall*, 473 F.2d 974, 978 (2d Cir. 1972)
- *Patterson v. Ponte*, No. 16-CV-3156 (PAE) (JCF), 2017 WL 1194489, at *6-*7 (S.D.N.Y. Mar. 30, 2017)
- *Youmans v. Schriro*, No. 12-CV-3690 (PAE) (JCF), 2013 WL 6284422, at *2, *5 (S.D.N.Y. Dec. 3, 2013)
- *White v. Schriro*, No. 16-CV-6769 (PAE) (JCF), 2017 WL 3268202, at *3 (S.D.N.Y. July 31, 2017)
- *Hill v. Curcione*, 657 F.3d 116, 123-24 (2d Cir. 2011)
- *Salahuddin v. Cuomo*, 861 F.2d 40, 42 (2d Cir. 1988)

- *Cuoco v. Moritsugu*, 222 F.3d 99, 112 (2d Cir. 2000)
- *Gomez v. USAA Fed. Sav. Bank*, 171 F.3d 794, 795 (2d Cir. 1999)

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