

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
PENNSYLVANIA

Jihaad Harrison v. Ms. Woodard, Ms. Stickney

Harrison · No. No. 25-3500 · Decided January 9, 2026

SUMMARY

The United States District Court for the Eastern District of Pennsylvania dismissed without prejudice Jihaad Harrison’s Eighth Amendment deliberate-indifference claims against mental health professionals at SCI Phoenix. The court held that Harrison had not plausibly alleged proper exhaustion of the Pennsylvania Department of Corrections’ three-step grievance process under the Prison Litigation Reform Act. The court allowed timely amendment to plead facts showing exhaustion of the relevant grievances.

CASE DETAILS

COURT	United States District Court for the Eastern District of Pennsylvania
WRITING FOR THE COURT	Mark A. Kearney
JURISDICTION	United States District Court for the Eastern District of Pennsylvania
DECIDED	January 9, 2026
DOCKET	No. 25-3500
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendants Ms. Woodard and Ms. Stickney moved to dismiss an incarcerated plaintiff's 42 U.S.C. § 1983 claims for failure to exhaust administrative remedies under the Prison Litigation Reform Act. The court considered the grievance records attached to the motion without converting it into a motion for summary judgment and granted dismissal without prejudice.
STANDARD OF REVIEW	On a motion to dismiss asserting failure to exhaust, the court may consider indisputably authentic documents related to the plaintiff's grievances without converting the motion to one for summary judgment. The court evaluates exhaustion under the facility's established grievance procedures and accepts well-pleaded allegations while considering authenticated grievance materials.
PRECEDENTIAL VALUE	unknown

TOPICS

motions to dismiss

prisoners rights

section 1983

civil rights

affirmative defenses

PRACTICE AREAS

civil procedure

prisoner civil rights

constitutional litigation

QUESTIONS PRESENTED

1. Whether Pennsylvania's DC-ADM 804 grievance process, rather than the separate DC-ADM 001 abuse-reporting procedure, governed exhaustion of Harrison's claims.
2. Whether Harrison properly exhausted administrative remedies for the four grievances underlying the claims against Woodard and Stickney.
3. Whether Harrison abandoned the claims associated with two grievances by failing to respond substantively to defendants' exhaustion arguments.
4. Whether the defendants could raise failure to exhaust in a motion to dismiss based on authentic grievance records.

HOLDINGS

1. DC-ADM 804 governed exhaustion because Harrison's allegations concerned denial of medical treatment, verbal threats, and dissatisfaction with staff conduct, all of which fell outside DC-ADM 001's definition of abuse.
2. Harrison did not properly exhaust the claims because the allegations did not show completion of the required second step of the DC-ADM 804 process: appealing the initial grievance responses to the Facility Manager.
3. Harrison waived opposition to dismissal of the deliberate-indifference claims arising from Grievance Nos. 1146246 and 1147398 by failing to substantively respond to defendants' exhaustion arguments.
4. Failure to exhaust, although an affirmative defense rather than a pleading requirement, may be raised in an appropriate motion to dismiss when the exhaustion issue turns on indisputably authentic grievance documents.

KEY QUOTATIONS

“Failure to exhaust is an affirmative defense the defendant must plead and prove; it is not a pleading requirement for the [incarcerated] plaintiff.” (Section II)

“What constitutes “proper” exhaustion depends entirely on the facility’s established grievance policies.” (Section II)

“While ADM 001 and ADM 804 work “‘in tandem,’ they are not ‘interchangeable,’ and a[n incarcerated person] must fully comply with the administrative review process under ADM 804 to satisfy the exhaustion requirement.” (Section II.A)

FACTUAL BACKGROUND

Harrison was incarcerated at SCI Phoenix beginning April 10, 2025 and alleged that mental-health professionals Woodard and Stickney denied or failed to provide treatment and caused emotional distress. Harrison filed four grievances between May 7 and May 22, 2025, labeling some as abuse complaints and alleging denial of medical treatment, staff conduct, and threats of disciplinary action. The grievance records showed initial responses to at least two grievances, but Harrison did not plead facts showing an appeal to the Facility Manager, the second step required by Pennsylvania's DC-ADM 804 grievance process.

PROCEDURAL HISTORY

Harrison sued SCI Phoenix and various state officials and health-care providers on July 7, 2025, asserting Eighth Amendment deliberate-indifference and Fourteenth Amendment due-process claims. The court granted in forma pauperis status, screened the complaint under 28 U.S.C. § 1915A, dismissed the due-process claim, dismissed SCI Phoenix with prejudice because it is not a person subject to suit under § 1983, and dismissed claims against several other defendants without prejudice. The remaining defendants, Woodard and Stickney, moved to dismiss based on nonexhaustion. The court granted the motion without prejudice and allowed timely amendment to plead exhaustion.

DISPOSITION

dismissed

REMAND INSTRUCTIONS

No remand. Harrison may timely amend the complaint, if possible, to plead facts showing proper exhaustion of the claims arising from all four grievances.

CASES CITED

- Woodford v. Ngo, 548 U.S. 81, 93 (2006)
- Prater v. Department of Corrections, 76 F.4th 184, 203-04 (3d Cir. 2023)
- Jones v. Bock, 549 U.S. 199, 212, 216-18 (2007)
- Rinaldi v. United States, 904 F.3d 257, 261 n.1, 266-67 (3d Cir. 2018)
- Ross v. Blake, 578 U.S. 632, 633 (2016)
- Small v. Camden County, 728 F.3d 265, 268 (3d Cir. 2013)
- Ray v. Kertes, 285 F.3d 287, 295 (3d Cir. 2002)
- Talley v. Constanzo, No. 19-2650, 2022 WL 17352167, at *2 (3d Cir. Dec. 1, 2022)
- Brown v. Croak, 312 F.3d 109, 111 (3d Cir. 2002)
- Downey v. Pennsylvania Department of Corrections, 968 F.3d 299, 305-06 (3d Cir. 2020)
- Williams v. Stickney, No. 22-214, 2025 WL 2200911, at *6-7 (E.D. Pa. July 31, 2025)
- Everett v. Robinson, No. 22-2890, 2023 WL 6458850, at *2 (3d Cir. Oct. 4, 2023)
- Rice v. Kernizan, No. 24-1501, 2025 WL 242834, at *4 n.5 (E.D. Pa. Jan. 17, 2025)

- Freedland v. Fanelli, No. 18-2250, 2019 WL 2448810, at *2 (E.D. Pa. June 10, 2019)
- Stanley v. Little, No. 23-4571, 2024 WL 3678987, at *5 n.6 (E.D. Pa. Aug. 6, 2024)
- Mayer v. Belichick, 605 F.3d 223, 230 (3d Cir. 2010)
- Spruill v. Gillis, 372 F.3d 218, 223 (3d Cir. 2004)
- Arcuri v. County of Montgomery, No. 20-5408, 2021 WL 1811576, at *10 (E.D. Pa. May 6, 2021)

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