

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
LOUISIANA, SHREVEPORT DIVISION

Quantrus Terrell Green v. Jennifer Jackson

No. 25-696-P, United States District Court for the Western District of Louisiana, Shreveport Division (December 4, 2025)

SUMMARY

This Report and Recommendation addresses a pro se pretrial detainee’s 42 U.S.C. § 1983 claims alleging deliberate indifference to medical needs, including delayed and inadequate treatment for a broken thumb and denial of previously prescribed medication. The magistrate judge recommends dismissal with prejudice as frivolous under 28 U.S.C. § 1915(e), concluding that the allegations show disagreement with medical treatment and, at most, negligence rather than deliberate indifference.

CASE DETAILS

COURT	United States District Court for the Western District of Louisiana, Shreveport Division
WRITING FOR THE COURT	Mark L. Hornsby
JURISDICTION	United States District Court for the Western District of Louisiana, Shreveport Division
DECIDED	December 4, 2025
DOCKET	25-696-P
DISPOSITION	other
PROCEDURAL POSTURE	Pro se pretrial detainee filed an in forma pauperis action under 42 U.S.C. § 1983 alleging inadequate medical care and denial of prescribed medication. The matter was referred to a magistrate judge for a report and recommendation under the court's standing order.
STANDARD OF REVIEW	For a pretrial detainee's episodic denial or inadequacy of medical care claim, the applicable standard is subjective deliberate indifference: subjective knowledge of a substantial risk of serious medical harm followed by a deliberately indifferent response. An in forma pauperis complaint may be dismissed as frivolous when it lacks an arguable basis in law or fact.
PRECEDENTIAL VALUE	nonprecedential

PARTIES

Quantrus Terrell Green v. Jennifer Jackson

TOPICS

section 1983

prisoners rights

due process

cruel and unusual punishment

civil procedure

PRACTICE AREAS

civil rights

prisoner civil rights

constitutional law

medical-care claims

QUESTIONS PRESENTED

1. Whether Green's allegations that jail medical personnel delayed or disagreed with treatment for his broken thumb and failed to provide previously prescribed medication stated a constitutional claim for deliberate indifference to serious medical needs under 42 U.S.C. § 1983.
2. Whether the in forma pauperis complaint should be dismissed as frivolous under 28 U.S.C. § 1915(e).

HOLDINGS

1. The allegations did not state a deliberate-indifference claim because Green received repeated examinations, x-rays, medical visits, and pain medication, and his allegations primarily reflected disagreement with the diagnostic measures and treatment provided.
2. The complaint should be dismissed with prejudice as frivolous under 28 U.S.C. § 1915(e).

KEY QUOTATIONS

“a state official's episodic act or omission violates a pretrial detainee's due process right to medical care if the official acts with subjective deliberate indifference to the detainee's rights.” (at 3)

“subjective knowledge of a substantial risk of serious medical harm, followed by a response of deliberate indifference.” (at 3)

“disagreement with the diagnostic measures or methods of treatment afforded by prison officials does not state a claim for Eighth Amendment indifference to medical needs.” (at 6)

“mere negligence, neglect or medical malpractice does not amount to a denial of a constitutional right” (at 7)

FACTUAL BACKGROUND

Green was a pretrial detainee at Caddo Correctional Center after an April 5, 2025 arrest during which he claimed his right thumb was broken. He alleged that Nurse Jackson delayed x-rays, denied referral to LSU Medical Center, failed to cast or pin the thumb, inadequately treated his pain, and refused medication prescribed before his arrest for an infection. Green acknowledged repeated medical encounters, including examinations, x-rays, and treatment with Tylenol and ibuprofen, but disagreed with the treatment and claimed his thumb healed improperly.

PROCEDURAL HISTORY

Green filed his complaint on May 20, 2025, alleging that Nurse Jennifer Jackson and other medical personnel inadequately treated his broken thumb, delayed x-rays, failed to provide outside medical treatment, and refused medication prescribed before his arrest. The magistrate judge concluded that the allegations showed repeated medical attention, pain medication, examinations, and x-rays, and reflected disagreement with treatment rather than deliberate indifference. The report recommended dismissal with prejudice as frivolous under 28 U.S.C. § 1915(e), subject to objections under 28 U.S.C. § 636(b)(1)(C) and Federal Rule of Civil Procedure 72(b).

DISPOSITION

other

CASES CITED

- Scott v. Moore, 114 F.3d 51, 53 (5th Cir. 1997)
- Hare v. City of Corinth, 74 F.3d 633, 644 (5th Cir. 1996)
- Nerren v. Livingston Police Dept., 86 F.3d 469, 473 (5th Cir. 1996)
- Farmer v. Brennan, 511 U.S. 825, 114 S.Ct. 1970, 128 L.Ed.2d 811, 823, 825
- Reeves v. Collins, 27 F.3d 174, 176 (5th Cir. 1994)
- Estelle v. Gamble, 429 U.S. 97, 97 S.Ct. 285, 50 L.Ed.2d 251, 106, 97 S.Ct. at 292 (1976)
- Graves v. Hampton, 1 F.3d 315, 319-20 (5th Cir. 1993)
- Norton v. Dimazana, 122 F.2d 286, 292 (5th Cir. 1997)
- Mendoza v. Lynaugh, 989 F.2d 191, 195 (5th Cir. 1993)
- Spears v. McCotter, 766 F.2d 179, 181 (5th Cir. 1985)
- Mayweather v. Foti, 958 F.2d 91 (5th Cir. 1992)
- Callaway v. Smith County, 991 F. Supp. 801, 809 (E.D. Tex. 1998)
- Stewart v. Murphy, 174 F.3d 530, 535 (5th Cir. 1999)
- Daniels v. Williams, 474 U.S. 327, 329-30, 106 S. Ct. 662, 664 (1986)
- Lewis v. Woods, 848 F.2d 649, 651 (5th Cir. 1988)
- Green v. McKaskle, 788 F.2d 1116, 1119 (5th Cir. 1986)
- Hicks v. Garner, 69 F.3d 22 (5th Cir. 1995)
- Booker v. Koonce, 2 F.3d 114 (5th Cir. 1993)
- Neitzke v. Williams, 490 U.S. 319, 109 S.Ct. 1827 (1989)
- Douglas v. U.S.A.A., 79 F.3d 1415 (5th Cir. 1996) (en banc)