

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OHIO, EASTERN DIVISION

Hudson v. Smallwood

No. 4:24-cv-2129 (N.D. Ohio Jan. 30, 2026) · No. 4:24-cv-2129 · Decided January 30, 2026

SUMMARY

The United States District Court for the Northern District of Ohio denied Defendant Sy Smallwood’s motion to dismiss an incarcerated plaintiff’s Eighth Amendment failure-to-protect claim under 42 U.S.C. § 1983. The court held that the complaint sufficiently alleged an objective substantial risk of serious harm and that Smallwood knew of and allegedly disregarded that risk. The court also denied the plaintiff’s motion for judicial notice concerning prison mail delays and legal-mail handling.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Eastern Division
WRITING FOR THE COURT	Benita Y. Pearson
JURISDICTION	United States District Court for the Northern District of Ohio, Eastern Division
DECIDED	January 30, 2026
DOCKET	4:24-cv-2129
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff brought an action under 42 U.S.C. § 1983 alleging that a prison official violated the Eighth Amendment by failing to protect him from inmate-on-inmate violence. Defendant moved to dismiss under Federal Rule of Civil Procedure 12(b)(6), and Plaintiff moved for judicial notice under Federal Rule of Evidence 201.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded allegations as true, construes them in the plaintiff's favor, and determines whether the complaint states a facially plausible claim for relief. The court may consider the complaint, exhibits attached to it, public records, and items appearing in the record without converting the motion into one for summary judgment.
PRECEDENTIAL VALUE	Unpublished federal district court order; nonprecedential

PARTIES

William A. Hudson v. S. Smallwood

TOPICS

section 1983

prisoners rights

cruel and unusual punishment

motions to dismiss

judicial notice

PRACTICE AREAS

civil rights

prisoner litigation

constitutional law

civil procedure

QUESTIONS PRESENTED

1. Whether Hudson sufficiently pleaded an Eighth Amendment failure-to-protect claim under 42 U.S.C. § 1983 to survive a Rule 12(b)(6) motion.
2. Whether the complaint and attached materials alleged facts satisfying the objective substantial-risk and subjective deliberate-indifference components of a failure-to-protect claim.
3. Whether the court could take judicial notice of alleged delays in prison mail delivery and Hudson's request that legal mail be opened in his presence.

HOLDINGS

1. Hudson sufficiently pleaded an Eighth Amendment failure-to-protect claim because his allegations plausibly showed both a substantial risk of serious harm and that Smallwood knew of and failed to respond reasonably to that risk.
2. The complaint adequately alleged that Hudson faced an objectively substantial risk of serious harm.
3. The complaint adequately alleged that Smallwood knew of Hudson's security concerns and that whether Smallwood responded reasonably was a factual question inappropriate for resolution on a motion to dismiss.
4. The court denied Hudson's motion for judicial notice because the requested matters were characterizations of administrative processes and were neither matters of public record nor indisputable facts.

KEY QUOTATIONS

“At this juncture, Plaintiff has sufficiently pled allegations to survive a motion to dismiss.” (Section III.A)

“The “facts” Plaintiff seeks the Court to judicially notice are not facts, but rather, his characterizations of administrative processes at TCI regarding prisoner mail inspection and services.” (Section III.B)

FACTUAL BACKGROUND

While incarcerated at Trumbull Correctional Institution, William Hudson was placed in Limited Privilege Housing after a Rules Infraction Board proceeding. Before the move, Hudson sent Smallwood a written message warning that he did not get along with inmates Pack and German, noting that he had recently fought with German and feared possible altercations. Smallwood acknowledged the concern and asked Hudson to remind

him and staff to place Hudson on the opposite range, but Hudson was housed two cells from Pack and was later attacked by Pack and another inmate, suffering significant head and facial injuries.

PROCEDURAL HISTORY

Hudson alleged that he warned Smallwood that he feared altercations with two inmates before being placed in Limited Privilege Housing, but was housed near one of them and subsequently assaulted. Hudson filed a grievance, which was denied through the institutional process, and then filed this federal action. The court denied both the motion to dismiss and the motion for judicial notice, allowing the failure-to-protect claim to proceed.

DISPOSITION

other

CASES CITED

- State ex rel. Clark v. Department of Rehabilitation and Correction, 178 Ohio St. 3d 344, 2025-Ohio-895, ¶ 1 n.1 (Ohio 2025)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555, 556-57, 564, 570 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 677-79 (2009)
- Handy-Clay v. City of Memphis, Tennessee, 695 F.3d 531, 539 (6th Cir. 2012)
- Ira Svendsgaard & Associates, Inc. v. AllFasteners USA, LLC, No. 1:20 CV 328, 2021 WL 4502798, at *3 (N.D. Ohio Oct. 1, 2021)
- Gavitt v. Born, 835 F.3d 623, 640 (6th Cir. 2016)
- West v. Atkins, 487 U.S. 42, 48 (1988)
- Bishop v. Hackel, 636 F.3d 757, 766 (6th Cir. 2011)
- Farmer v. Brennan, 511 U.S. 825, 833-34, 842 (1994)
- Reedy v. West, 998 F.3d 907, 913-14 (6th Cir. 2021)
- Beck, 969 F.3d at 600
- Richko v. Wayne County, 819 F.3d 907, 915 (6th Cir. 2016)
- Young v. Campbell County, Kentucky, 846 F. App'x 314, 320-21 (6th Cir. 2021)
- Amick v. Ohio Department of Rehabilitation and Correction, 521 F. App'x 354, 362 (6th Cir. 2013)
- Zakora v. Chrisman, 44 F.4th 452, 469, 472 (6th Cir. 2022)
- Helling v. McKinney, 509 U.S. 25, 36 (1993)
- Rhodes v. Michigan, 10 F.4th 665, 674-74 (6th Cir. 2021)
- Street v. Corrections Corporation of America, 102 F.3d 810, 815 (6th Cir. 1996)
- Woods v. Lecureux, 110 F.3d 1215, 1223 (6th Cir. 1997)
- Passa v. City of Columbus, 123 F. App'x 694, 697 (6th Cir. 2005)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/state/united-states-district-court-for-the-northern-district-of-ohio-eastern-division-united-states-distri/2026/hudson-v-smallwood-ggq0x9ffv>