

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
TENNESSEE

Connie Arnold v. Centurion of Tennessee, LLC, et al.

Arnold · No. 1:24-cv-201 · Decided March 9, 2026

SUMMARY

The United States District Court for the Eastern District of Tennessee dismissed Connie Arnold’s pro se 42 U.S.C. § 1983 action against Centurion of Tennessee and several correctional and medical defendants. The court held that most claims were barred by Tennessee’s one-year statute of limitations and that the continuing-violation doctrine did not apply. The remaining claims, including claims under the ADA, Rehabilitation Act, Title VII, and allegations concerning later medical-care incidents, were dismissed for failure to state a claim.

CASE DETAILS

COURT	United States District Court for the Eastern District of Tennessee
WRITING FOR THE COURT	Travis R. McDonough
JURISDICTION	United States District Court for the Eastern District of Tennessee
DECIDED	March 9, 2026
DOCKET	1:24-cv-201
DISPOSITION	dismissed
PROCEDURAL POSTURE	A pro se Tennessee prisoner brought claims under 42 U.S.C. § 1983, the Americans with Disabilities Act, the Rehabilitation Act, and Title VII. The district court screened the complaint under the Prison Litigation Reform Act and dismissed the action sua sponte.
STANDARD OF REVIEW	The court screened the prisoner complaint under 28 U.S.C. §§ 1915(e)(2)(B) and 1915A, applying the Rule 12(b)(6) plausibility standard. Pro se pleadings were liberally construed.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion
PARTIES	Connie Arnold v. Centurion of Tennessee, LLC, Shawn Phillips, Brett Cobble, Kaitlin Campbell, Emma Rich, Brian Samuel, Stephen Bartek, Phyllis Sutton, Nathan Tollett, Milton Salomon, Jessica Mussard

TOPICS

prisoners rights

section 1983

statute of limitations

ada / disability

civil procedure

PRACTICE AREAS

civil rights

prisoner litigation

constitutional law

disability discrimination

civil procedure

QUESTIONS PRESENTED

1. Whether Arnold's claims arising from incidents before August 15, 2023, were barred by Tennessee's one-year statute of limitations.
2. Whether the continuing-violation doctrine saved Arnold's otherwise untimely § 1983 claims.
3. Whether Arnold stated viable claims under the ADA and Rehabilitation Act against the named defendants.
4. Whether Arnold stated a Title VII claim.
5. Whether the August 15, 2023, denial of requests for medication and an eye specialist stated a § 1983 deliberate-indifference claim.
6. Whether the August 29, 2023, allegations concerning left-hand pain stated an Eighth Amendment deliberate-indifference claim.

HOLDINGS

1. Arnold's § 1983 claims based on incidents occurring before August 15, 2023, were barred by Tennessee's one-year statute of limitations.
2. The continuing-violation doctrine did not save Arnold's untimely claims because the alleged events were discrete, separately actionable incidents rather than continuing unlawful acts.
3. Arnold failed to state an ADA or Rehabilitation Act claim because the statutes do not impose liability on individual defendants or the private entity Centurion under the allegations presented, and he pleaded no facts plausibly showing disability discrimination.
4. Arnold failed to state a Title VII claim because his amended complaint did not plausibly allege the elements of employment discrimination or harassment.
5. Arnold failed to state a § 1983 deliberate-indifference claim based on the alleged denial of medication and an eye-specialist appointment on August 15, 2023.
6. Arnold failed to state an Eighth Amendment deliberate-indifference claim based on the August 29, 2023, treatment of his left-hand pain.

KEY QUOTATIONS

“The continuing violation doctrine applies most frequently in the context of Title VII discrimination claims, but the Sixth Circuit has held that it may “rarely” apply in § 1983 actions.”

“A patient’s disagreement with his physicians over the proper course of treatment alleges, at most, a medical-malpractice claim, which is not cognizable under § 1983.”

“Medical malpractice does not become a constitutional violation merely because the victim is a prisoner.”

FACTUAL BACKGROUND

Arnold, a TDOC prisoner housed at Bledsoe County Correctional Complex, alleged that prison medical personnel mishandled treatment for glaucoma, cataracts, vision loss, leg swelling, and hand pain. He claimed that providers denied specialist care, supplied incorrect or expired medications and eyeglasses, discontinued leg-wrap treatment, and retaliated against him for filing grievances. The only potentially timely incidents involved denied medical requests on August 15, 2023, and treatment for left-hand pain on August 29, 2023.

PROCEDURAL HISTORY

Arnold filed a complaint on June 14, 2024, alleging deficient medical care, retaliation, disability discrimination, and employment discrimination arising from his confinement at Bledsoe County Correctional Complex. After the court previously identified statute-of-limitations concerns, Arnold responded that the earlier events formed a continuing violation. The court held that claims arising before August 15, 2023, were untimely and that the remaining claims failed to state a claim. The court dismissed the action and certified that an appeal would not be taken in good faith.

DISPOSITION

dismissed

CASES CITED

- Benson v. O'Brian, 179 F.3d 1014 (6th Cir. 1999)
- Ashcroft v. Iqbal, 556 U.S. 662 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544 (2007)
- Hill v. Lappin, 630 F.3d 468, 470-71 (6th Cir. 2010)
- Haines v. Kerner, 404 U.S. 519, 520 (1972)
- Harris v. United States, 422 F.3d 322, 331 (6th Cir. 2005)
- Eidson v. State of Tenn. Dep't of Children's Servs., 510 F.3d 631, 635 (6th Cir. 2007)
- Delaware State College v. Ricks, 449 U.S. 250, 258 (1980)
- National Parks Conservation Ass'n, Inc. v. Tennessee Valley Authority, 480 F.3d 410, 416 (6th Cir. 2007)
- Sharpe v. Cureton, 319 F.3d 259, 266-67 (6th Cir. 2003)
- Goldsmith v. Sharrett, 614 F. App'x 824, 829 (6th Cir. 2015)
- National Railroad Passenger Corp. v. Morgan, 536 U.S. 101, 114-15 (2002)
- Brown v. Louisville-Jefferson County Metro Government, 135 F.4th 1022, 1035 (6th Cir. 2025)
- Tolbert v. Ohio Department of Transportation, 172 F.3d 934, 940 (6th Cir. 1999)
- Howell v. Cox, 758 F. App'x 480, 484 (6th Cir. 2018)
- Norman v. Granson, 2020 WL 3240900, at *2 (6th Cir. Mar. 25, 2020)
- Thompson v. Williamson County, Tennessee, 219 F.3d 555, 557 n.3 (6th Cir. 2000)

- Lee v. Michigan Parole Board, 104 F. App'x 490, 493 (6th Cir. 2004)
- Vick v. CoreCivic, 329 F. Supp. 3d 426, 441-42 (M.D. Tenn. 2018)
- Fullen v. City of Columbus, 514 F. App'x 601, 606-07 (6th Cir. 2013)
- Frazier v. Michigan, 41 F. App'x 762, 764 (6th Cir. 2002)
- Coleman v. Hamilton County Board of County Commissioners, 130 F.4th 593, 599 (6th Cir. 2025)
- Estelle v. Gamble, 429 U.S. 97, 104-06 (1976)
- Blackmore v. Kalamazoo County, 390 F.3d 890, 895, 897 (6th Cir. 2004)
- Farmer v. Brennan, 511 U.S. 825, 834, 837, 842 (1994)
- Harrison v. Ash, 539 F.3d 510, 518 (6th Cir. 2008)
- Westlake v. Lucas, 537 F.2d 857, 860 n.5 (6th Cir. 1976)
- Darrah v. Krisher, 865 F.3d 361, 372 (6th Cir. 2017)
- Sanderfer v. Nichols, 62 F.3d 151, 154-55 (6th Cir. 1995)
- Gabehart v. Chapleau, 1997 WL 160322, at *2 (6th Cir. Apr. 4, 1997)
- Dulany v. Carnahan, 132 F.3d 1234, 1239 (8th Cir. 1997)
- Twombly, 550 U.S. at 570