

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

Andre Lee Hilliard v. Clark, et al.

Hilliard · No. 23-cv-00472 · Decided February 23, 2026

SUMMARY

The United States District Court for the Northern District of Illinois granted Defendant Elizabeth English-Lindsey’s motion for summary judgment in a 42 U.S.C. § 1983 action alleging deliberate indifference to medical needs. The court held that the plaintiff failed to exhaust administrative remedies because his grievances neither named English-Lindsey nor provided sufficient identifying information to alert prison officials that she was accused of wrongdoing.

CASE DETAILS

COURT	United States District Court for the Northern District of Illinois, Eastern Division
WRITING FOR THE COURT	Mary M. Rowland
JURISDICTION	United States District Court for the Northern District of Illinois, Eastern Division
DECIDED	February 23, 2026
DOCKET	23-cv-00472
DISPOSITION	other
PROCEDURAL POSTURE	Defendant English-Lindsey moved for summary judgment in a prisoner civil-rights action, arguing that Plaintiff failed to exhaust administrative remedies under the Prison Litigation Reform Act.
STANDARD OF REVIEW	Summary judgment is proper when there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The court viewed the evidence and reasonable inferences in the light most favorable to the nonmoving party, without making credibility determinations or weighing evidence.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion; precedential status unknown
PARTIES	Andre Lee Hilliard v. Elizabeth English-Lindsey, Clark, et al.

TOPICS

summary judgment

prisoners rights

section 1983

civil rights

civil procedure

PRACTICE AREAS

civil procedure

civil rights

prisoner litigation

health law

QUESTIONS PRESENTED

1. Whether English-Lindsey was entitled to summary judgment because Hilliard failed to exhaust administrative remedies concerning his allegations against her.
2. Whether prison officials' merits responses to Hilliard's grievance precluded English-Lindsey from asserting failure to exhaust.
3. Whether a prisoner must name a defendant in a grievance, or provide identifying information sufficient to alert prison officials that the defendant is accused of wrongdoing.

HOLDINGS

1. Prison officials' response to the merits of a grievance does not eliminate the failure-to-exhaust defense where the grievance did not identify the defendant or provide sufficient information for officials to determine that the defendant was accused of wrongdoing.
2. A prisoner need not identify a defendant by name in a grievance, but must provide identifying information sufficient for prison officials to determine that the defendant was accused of wrongdoing.
3. Hilliard failed to exhaust available administrative remedies concerning his allegations against English-Lindsey.

KEY QUOTATIONS

“However, a plaintiff who fails to mention by name or provide any identifying information that indicates the defendant to the grievance officer fails to exhaust.” (Analysis II)

“For the stated reasons, this Court grants Defendant English-Lindsey’s motion for summary judgment.” (Conclusion)

FACTUAL BACKGROUND

Hilliard was incarcerated at the Joliet Treatment Center and alleged that he was denied timely medical care after being sprayed with mace on February 24, 2022. He filed grievances concerning the incident, but the April 5 grievance identified numerous individuals while omitting English-Lindsey and providing no description or other identifying information pointing to her. Hilliard admitted that he did not include English-Lindsey in his grievances because she was a supervisor.

PROCEDURAL HISTORY

Hilliard brought a 42 U.S.C. § 1983 action concerning alleged deliberate indifference to his medical needs while incarcerated. English-Lindsey moved for summary judgment based on failure to exhaust administrative remedies. The court denied Defendant's request to strike portions of Plaintiff's factual submissions, granted the

summary-judgment motion, terminated English-Lindsey as a defendant, and allowed the action to continue against other defendants.

DISPOSITION

other

CASES CITED

- Celotex Corp. v. Catrett, 477 U.S. 317, 322 (1986)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248, 255 (1986)
- Skiba v. Ill. Cent. R.R. Co., 884 F.3d 708, 717 (7th Cir. 2018)
- Viamedia, Inc. v. Comcast Corp., 951 F.3d 429, 467 (7th Cir. 2020)
- White v. City of Chicago, 829 F.3d 837, 841 (7th Cir. 2016)
- Petty v. City of Chicago, 754 F.3d 416, 420 (7th Cir. 2014)
- Judson Atkinson Candies, Inc. v. Latini-Hohberger Dhimantec, 529 F.3d 371, 382 n.2 (7th Cir. 2008)
- Crouch v. Brown, 27 F.4th 1315, 1320 (7th Cir. 2022)
- Woodford v. Ngo, 548 U.S. 81, 90–91 (2006)
- Dole v. Chandler, 438 F.3d 804, 809 (7th Cir. 2006)
- Reid v. Balota, 962 F.3d 325, 329 (7th Cir. 2020)
- Chambers v. Sood, 956 F.3d 979, 983 (7th Cir. 2020)
- Porter v. Nussle, 534 U.S. 516, 525 (2002)
- Maddox v. Love, 655 F.3d 709, 722 (7th Cir. 2011)
- Olden v. Jackson, No. 23-1570, 2024 WL 4601042, at *3–4 (7th Cir. 2024)
- King v. Dart, 63 F.4th 602, 608–09 (7th Cir. 2023)
- Jones v. Bock, 549 U.S. 199, 219 (2007)
- Roberts v. Neal, 745 F.3d 232, 234–36 (7th Cir. 2014)
- Barrow v. Wexford Health Sources, Inc., 793 F. App'x 420, 423 (7th Cir. 2019)
- Conyers v. Abitz, 416 F.3d 580, 584–85 (7th Cir. 2005)
- Riccardo v. Rausch, 375 F.3d 521, 524 (7th Cir. 2004)