

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
ILLINOIS

Travonte Lindsey v. Zachary McClanahan, et al.

Lindsey v. McClanahan · No. 3:24-cv-2290-RJD · Decided December 5, 2025

SUMMARY

The United States District Court for the Southern District of Illinois ruled on cross-motions concerning exhaustion of administrative remedies in Travonte Lindsey's 42 U.S.C. § 1983 action. The court held that the grievance exhausted Lindsey's conditions-of-confinement claim against Zachary McClanahan but did not exhaust his deliberate-indifference claims against McClanahan or Nurse Practitioner Crane. Those two claims were dismissed without prejudice, while the conditions-of-confinement claim survived exhaustion-based summary judgment.

CASE DETAILS

COURT	United States District Court for the Southern District of Illinois
WRITING FOR THE COURT	Reona J. Daly
JURISDICTION	United States District Court for the Southern District of Illinois
DECIDED	December 5, 2025
DOCKET	3:24-cv-2290-RJD
DISPOSITION	other
PROCEDURAL POSTURE	The parties filed cross-motions concerning exhaustion of administrative remedies in a prisoner civil-rights action. Following an evidentiary hearing under <i>Pavey v. Conley</i> , the court granted the motions in part and denied them in part.
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. In prisoner-exhaustion cases involving disputed facts, the court conducts an evidentiary hearing and resolves the factual dispute under <i>Pavey v. Conley</i> . Defendants bear the burden of showing beyond dispute that administrative remedies were available.
PRECEDENTIAL VALUE	Unpublished district-court order; precedential status unknown and not designated as precedential in the source metadata.

TOPICS

summary judgment

prisoners rights

section 1983

civil rights

civil procedure

PRACTICE AREAS

Civil procedure

Prisoner civil rights

Constitutional law

Administrative exhaustion

Summary judgment

QUESTIONS PRESENTED

1. Whether Lindsey's appeal to the Administrative Review Board should be treated as timely or excused as unavailable when he placed it in the prison mail system within the applicable thirty-day period but the Board received it later.
2. Whether Lindsey's grievance sufficiently exhausted his Eighth Amendment conditions-of-confinement claim against McClanahan despite not naming McClanahan.
3. Whether Lindsey's grievance sufficiently exhausted his deliberate-indifference claim against McClanahan for allegedly denying medical and mental-health care.
4. Whether Lindsey exhausted his deliberate-indifference claim against Nurse Practitioner Crane when the alleged interaction with Crane occurred after the only grievance was filed.

HOLDINGS

1. Lindsey's failure to obtain a substantive Administrative Review Board response before filing suit was excused because his testimony showed that he placed his appeal in the prison mail system within the thirty-day period and prison officials allegedly delayed processing the privileged mail; defendants did not rebut that evidence or prove that the administrative remedy remained available.
2. Lindsey exhausted Count 1, his Eighth Amendment conditions-of-confinement claim against McClanahan, even though he did not identify McClanahan by name or title in the grievance.
3. Lindsey did not exhaust Count 2, his deliberate-indifference claim against McClanahan for denying medical and mental-health care, because the grievance did not identify McClanahan's alleged denial of treatment or otherwise alert prison officials to that claim.
4. Lindsey did not exhaust Count 3, his deliberate-indifference claim against Crane, because the alleged interaction with Crane occurred after the only grievance was filed and Lindsey filed no later grievance concerning Crane's alleged refusal to provide medical care.

KEY QUOTATIONS

"Accordingly, the Court finds that Plaintiff's failure to receive a substantive response by the ARB before initiating this action is excused because Defendants failed to carry their burden of showing the administrative remedies were available." (8)

"Because Plaintiff's failure to identify Defendant McClanahan by name or title "did not prevent the prison from identifying" the latter and responding to Plaintiff's conditions of confinement claim, the Court finds that Grievance K4-1023-0839 contained sufficient information to exhaust Plaintiff's claim asserted in Count 1 of the Complaint." (9)

“Because the only grievance Plaintiff filed regarding this case predates the allegations against Defendant Crane, it could not have served its purpose of providing the facility with an opportunity to address Plaintiff’s claims against her.” (11)

FACTUAL BACKGROUND

Lindsey, an Illinois prisoner housed at Menard Correctional Center, alleged that he was served oatmeal containing insects on October 12, 2023, after which he experienced stomach pain and vomiting. He alleged that Major McClanahan participated in or was responsible for the incident and denied him medical or mental-health care, and that Nurse Practitioner Crane later refused to evaluate or treat him. Lindsey filed one grievance concerning the bug-infested food, appealed the institutional denial, and contended that prison staff delayed mailing his appeal to the Administrative Review Board.

PROCEDURAL HISTORY

Lindsey brought claims under 42 U.S.C. § 1983 alleging that he was served bug-infested oatmeal and denied medical and mental-health care. After threshold review under 28 U.S.C. § 1915A, the court allowed three Eighth Amendment claims to proceed. Defendants moved for summary judgment based on failure to exhaust administrative remedies, and Lindsey moved to establish that the grievance process was inadequate and that he had exhausted his remedies. The court held a Pavey evidentiary hearing and dismissed two claims without prejudice while allowing one claim to survive exhaustion-based summary judgment.

DISPOSITION

other

CASES CITED

- Pavey v. Conley, 544 F.3d 739, 742 (7th Cir. 2008)
- Celotex Corp. v. Catrett, 477 U.S. 317, 322-23 (1986)
- Ruffin-Thompkins v. Experian Information Solutions, Inc., 422 F.3d 603, 607 (7th Cir. 2005)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248, 250 (1986)
- Estate of Simpson v. Gorbett, 863 F.3d 740, 745 (7th Cir. 2017)
- Apex Digital, Inc. v. Sears, Roebuck & Co., 735 F.3d 962, 965 (7th Cir. 2013)
- Pozo v. McCaughtry, 286 F.3d 1022, 1024 (7th Cir. 2002)
- Perez v. Wisconsin Department of Corrections, 182 F.3d 532, 535 (7th Cir. 1999)
- Ford v. Johnson, 362 F.3d 395, 401 (7th Cir. 2004)
- Dole v. Chandler, 438 F.3d 804, 806-07, 809 (7th Cir. 2006)
- Chapman v. Wexford Health Services, No. 22-CV-1942-SMY, 2025 WL 578504, at *4 (S.D. Ill. Feb. 21, 2025)
- Porter v. Nussle, 534 U.S. 516, 525 (2002)
- Brown v. Briggs, No. 22-1963, 2023 WL 3674669, at *2 (7th Cir. May 26, 2023)

- Maddox v. Love, 655 F.3d 709, 722 (7th Cir. 2011)
- Lewis v. Washington, 300 F.3d 829, 833 (7th Cir. 2002)
- Dale v. Lappin, 376 F.3d 652, 656 (7th Cir. 2004)
- Ross v. Blake, 578 U.S. 632, 639-40 (2016)
- Ramirez v. Young, 906 F.3d 530, 533 (7th Cir. 2018)
- Wallace v. Baldwin, 55 F.4th 535, 543 (7th Cir. 2022)
- Olden v. Jackson, No. 23-1570, 2024 WL 4601042, at *4 (7th Cir. Oct. 29, 2024)
- Perttu v. Richards, 145 S. Ct. 1793 (2025)

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