

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
ILLINOIS

Prince Bills v. Nicholas Goodchild

Bills · No. 3:25-cv-00343-GCS · Decided January 21, 2026

SUMMARY

The United States District Court for the Southern District of Illinois grants Defendant Nicholas Goodchild’s motion for summary judgment on the issue of exhaustion under the Prison Litigation Reform Act. The court holds that Plaintiff Prince Bills filed suit before receiving final decisions from the Illinois Department of Corrections grievance process and dismisses the complaint without prejudice. The court directs the Clerk to enter judgment and close the case.

CASE DETAILS

COURT	United States District Court for the Southern District of Illinois
WRITING FOR THE COURT	Gilbert C. Sison
JURISDICTION	United States District Court for the Southern District of Illinois
DECIDED	January 21, 2026
DOCKET	3:25-cv-00343-GCS
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendant moved for summary judgment on the affirmative defense that Plaintiff failed to exhaust administrative remedies under the Prison Litigation Reform Act. The court granted the motion and dismissed the action without prejudice.
STANDARD OF REVIEW	Summary judgment is proper when the pleadings, discovery materials, and affidavits show no genuine dispute as to any material fact and the moving party is entitled to judgment as a matter of law. The court determines disputed factual issues concerning exhaustion under the Pavey procedure rather than submitting them to a jury.
PRECEDENTIAL VALUE	Unknown
PARTIES	Prince Bills v. Nicholas Goodchild

TOPICS

- summary judgment
- prisoners rights
- section 1983
- affirmative defenses
- civil procedure

PRACTICE AREAS

Federal civil procedure

Prisoner litigation

Civil rights

Summary judgment

Administrative exhaustion

QUESTIONS PRESENTED

1. Whether Plaintiff exhausted available administrative remedies before filing his § 1983 action.
2. Whether the action should be dismissed without prejudice because the administrative grievances remained pending when the lawsuit was filed.

HOLDINGS

1. A prisoner must fully exhaust available administrative remedies before filing a lawsuit concerning prison conditions; exhaustion after filing does not satisfy 42 U.S.C. § 1997e(a).
2. Bills failed to exhaust his administrative remedies before filing because the ARB had not issued final decisions on the grievances concerning his claims by March 1, 2025.

KEY QUOTATIONS

“no action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted.” (at 4)

“Plaintiff cannot sue first and exhaust later.” (at 8)

“Accordingly, this case is dismissed without prejudice for failure to exhaust administrative remedies.” (at 8-9)

FACTUAL BACKGROUND

Bills, formerly incarcerated at Lawrence Correctional Center, alleged that Goodchild slammed Bills's left hand and arm in a cell food slot on October 12, 2024, causing injury, and then denied him medical care. Bills filed grievances concerning the incident on October 14 and November 12, 2024, but the Administrative Review Board had not issued final decisions when Bills filed this lawsuit on March 1, 2025. The ARB later issued decisions in April and May 2025.

PROCEDURAL HISTORY

Bills filed a 42 U.S.C. § 1983 action concerning an alleged October 12, 2024 use of force and denial of medical care. After preliminary review, the court permitted Eighth Amendment excessive-force and deliberate-indifference claims and an Illinois assault-and-battery claim to proceed. Goodchild moved for summary judgment based on nonexhaustion, and the court resolved the exhaustion issue without an evidentiary hearing because there was no genuine dispute of material fact.

DISPOSITION

dismissed

CASES CITED

- Gupta v. Melloh, 19 F.4th 990, 997 (7th Cir. 2021)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 247 (1986)
- Williams v. Rajoli, 44 F.4th 1041, 1043, 1045 (7th Cir. 2022)
- Chambers v. Sood, 956 F.3d 979, 981, 983-984 (7th Cir. 2020)
- Jackson v. Esser, 105 F.4th 948, 956 (7th Cir. 2024)
- Maddox v. Love, 655 F.3d 709, 721 (7th Cir. 2011)
- Hacker v. Dart, 62 F.4th 1073, 1084 (7th Cir. 2023)
- Pavay v. Conley, 544 F.3d 739, 740-742 (7th Cir. 2008)
- Jones v. Lamb, 124 F.4th 463, 469 (7th Cir. 2024)
- Wagoner v. Lemmon, 778 F.3d 586, 590 (7th Cir. 2015)

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