

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Daniel Wayne Roland v. Wayne County Prison, et al.

Roland · No. 4:25-CV-01307 · Decided December 8, 2025

SUMMARY

The United States District Court for the Middle District of Pennsylvania dismissed Daniel Wayne Roland's pro se 42 U.S.C. § 1983 complaint for failure to state a claim. The court rejected claims concerning procedural due process, conditions of confinement, and failure to protect, including claims against Wayne County Prison and the Wayne County Prison Board. The court granted limited leave to amend only as to the Eighth Amendment failure-to-protect claim and dismissed the other claims with prejudice.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Matthew W. Brann
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	December 8, 2025
DOCKET	4:25-CV-01307
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se prisoner civil-rights action under 42 U.S.C. § 1983 reviewed at the statutory screening stage under 28 U.S.C. §§ 1915A and 1915(e).
STANDARD OF REVIEW	The court applied the Rule 12(b)(6) plausibility standard during screening under 28 U.S.C. §§ 1915A(b)(1) and 1915(e)(2)(B)(ii), accepting well-pleaded factual allegations as true, drawing reasonable inferences in the plaintiff's favor, disregarding legal conclusions, and liberally construing the pro se complaint.
PRECEDENTIAL VALUE	nonprecedential district-court memorandum opinion
PARTIES	Daniel Wayne Roland v. Wayne County Prison, Wayne County Prison Board, Randall Williams, John Masco, Paul Soccodato, Huffman, Jaycox, Carney

TOPICS

section 1983

prisoners rights

procedural due process

cruel and unusual punishment

motions to dismiss

PRACTICE AREAS

civil rights litigation

prisoner civil rights

constitutional torts

federal civil procedure

QUESTIONS PRESENTED

1. Whether Wayne County Prison and the Wayne County Prison Board were persons subject to suit under 42 U.S.C. § 1983.
2. Whether Roland plausibly pleaded official-capacity claims against the individual defendants without identifying a municipal policy or custom and an authorized decisionmaker.
3. Whether the alleged disciplinary segregation and disciplinary proceedings implicated a protected liberty interest sufficient to support a Fourteenth Amendment procedural-due-process claim.
4. Whether the conditions alleged in disciplinary segregation constituted a sufficiently serious deprivation and were imposed with deliberate indifference in violation of the Eighth Amendment.
5. Whether Roland plausibly alleged that a named defendant knew of a substantial risk that Michael Casabianca would attack him, acted with deliberate indifference, and thereby caused his injuries.

HOLDINGS

1. Wayne County Prison and Wayne County Prison Board are not persons subject to § 1983 liability, and Roland also failed to allege a policy or custom supporting municipal liability.
2. The official-capacity claims failed because Roland did not identify a municipal policy or custom that caused his constitutional injury or plausibly allege that any defendant was an authorized municipal decisionmaker.
3. Roland failed to state a procedural-due-process claim because the alleged disciplinary segregation and related punishment did not implicate a protected liberty interest.
4. Roland failed to state an Eighth Amendment conditions-of-confinement claim because the alleged restrictions and conditions did not constitute a sufficiently serious deprivation and the complaint did not plausibly allege deliberate indifference by a named defendant.
5. Roland failed to state a failure-to-protect claim as pleaded because he did not identify a named defendant who was subjectively aware of a substantial risk that Michael Casabianca would attack him, deliberately disregarded that risk, and thereby caused his injuries.
6. Roland was granted limited leave to amend only to attempt to state an Eighth Amendment failure-to-protect claim against a named defendant; the procedural-due-process and conditions-of-confinement claims were dismissed with prejudice because amendment would be futile.

KEY QUOTATIONS

“Therefore, because Roland has not identified, and cannot identify, a protected liberty interest that is at stake for his Fourteenth Amendment procedural due process claims, the analysis is at an end.” (Section III.C)

“The Court will grant Roland limited leave to amend in the event that he can plead additional facts that would plausibly state an Eighth Amendment failure-to-protect claim against a named Defendant.” (Section III.F)

“Based on the foregoing, the Court will dismiss Roland’s complaint pursuant to 28 U.S.C. § 1915A(b)(1) and 28 U.S.C. § 1915(e)(2)(B)(ii) for failure to state a claim upon which relief may be granted.” (Section IV)

FACTUAL BACKGROUND

Roland alleged that Wayne County Prison officials violated his constitutional rights during two January 2024 disciplinary proceedings, including by delaying a misconduct report and denying witnesses, and that he received ten-day periods of disciplinary custody. He also alleged that disciplinary segregation deprived him of ordinary recreation, religious services, meals, movement, law-library access, and device use. Finally, he alleged that inmate Michael Casabianca attacked him on March 1, 2024, causing injuries to his jaw and teeth, after unspecified prison staff allegedly knew of Casabianca's mental-health and behavioral problems.

PROCEDURAL HISTORY

Roland filed a § 1983 complaint in July 2025 concerning alleged prison disciplinary proceedings, conditions in disciplinary segregation, and an inmate assault. The court screened the complaint and concluded that all claims failed to state a claim upon which relief could be granted. The court dismissed the complaint, dismissed the procedural-due-process and conditions-of-confinement claims with prejudice, and granted limited leave to amend only as to a potentially viable failure-to-protect claim.

DISPOSITION

dismissed

CASES CITED

- Gonzaga University v. Doe, 536 U.S. 273, 284-85 (2002)
- Grayson v. Mayview State Hospital, 293 F.3d 103, 109-10, 114 (3d Cir. 2002)
- O'Brien v. U.S. Federal Government, 763 F. App'x 157, 159 (3d Cir. 2019)
- Allah v. Seiverling, 229 F.3d 220, 223 (3d Cir. 2000)
- Scheuer v. Rhodes, 416 U.S. 232, 236 (1974)
- Nami v. Fauver, 82 F.3d 63, 66 (3d Cir. 1996)
- Phillips v. County of Allegheny, 515 F.3d 224, 229 (3d Cir. 2008)
- Mayer v. Belichick, 605 F.3d 223, 230 (3d Cir. 2010)
- Pension Benefit Guaranty Corp. v. White Consolidated Industries, 998 F.2d 1192, 1196 (3d Cir. 1993)
- Connelly v. Lane Construction Corp., 809 F.3d 780, 787 (3d Cir. 2016)
- Ashcroft v. Iqbal, 556 U.S. 662, 675, 679, 681 (2009)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Rehberg v. Paulk, 566 U.S. 356, 361 (2012)

- *Imbler v. Pachtman*, 424 U.S. 409, 417 (1976)
- *Will v. Michigan Department of State Police*, 491 U.S. 58, 64-65, 71 (1989)
- *Slagle v. County of Clarion*, 435 F.3d 262, 264 n.3 (3d Cir. 2006)
- *Stankowski v. Farley*, 487 F. Supp. 2d 543, 554 (M.D. Pa. 2007)
- *Fischer v. Cahill*, 474 F.2d 991, 992 (3d Cir. 1973)
- *Monell v. Department of Social Services of the City of New York*, 436 U.S. 658, 690 n.55, 690-91 (1978)
- *Pembaur v. City of Cincinnati*, 475 U.S. 469, 481 (1986)
- *McTernan v. City of York*, 564 F.3d 636, 658 (3d Cir. 2009)
- *Hill v. Borough of Kutztown*, 455 F.3d 225, 233-35 (3d Cir. 2006)
- *Alvin v. Suzuki*, 227 F.3d 107, 116 (3d Cir. 2000)
- *Wilkinson v. Austin*, 545 U.S. 209, 221 (2005)
- *Sandin v. Conner*, 515 U.S. 472, 484, 486 (1995)
- *Smith v. Mensinger*, 293 F.3d 641, 654 (3d Cir. 2002)
- *Torres v. Fauver*, 292 F.3d 141, 151 (3d Cir. 2002)
- *Griffin v. Vaughn*, 112 F.3d 703, 705-07 (3d Cir. 1997)
- *Dunbar v. Barone*, 487 F. App'x 721, 725 (3d Cir. 2012)
- *Thomas v. Tice*, 948 F.3d 133, 139 (3d Cir. 2020)
- *Rhodes v. Chapman*, 452 U.S. 337, 349 (1981)
- *Helling v. McKinney*, 509 U.S. 25, 32 (1993)
- *Chavarriaga v. New Jersey Department of Corrections*, 806 F.3d 210, 226-27 (3d Cir. 2015)
- *Farmer v. Brennan*, 511 U.S. 825, 833-34, 842-43 (1994)
- *Wilson v. Seiter*, 501 U.S. 294, 297 (1991)
- *Clark v. Coupe*, 55 F.4th 167, 179 (3d Cir. 2023)
- *Palakovic v. Wetzel*, 854 F.3d 209, 227 (3d Cir. 2017)
- *Bistran v. Levi*, 696 F.3d 352, 366-67 (3d Cir. 2012)
- *Mack v. Yost*, 968 F.3d 311 (3d Cir. 2020)
- *Beers-Capitol v. Whetzel*, 256 F.3d 120, 125 (3d Cir. 2001)

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