

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Vincent Franklin v. L. Hicks

Franklin · No. 1:23-CV-1091 · Decided February 4, 2026

SUMMARY

The United States District Court for the Middle District of Pennsylvania granted defendant L. Hicks’s motion for summary judgment in Vincent Franklin’s 42 U.S.C. § 1983 class-of-one equal protection claim. The court held that Franklin, who was ordinarily administratively transferred, was not similarly situated to inmates transferred from SCI-Smithfield under COVID-19-specific guidance and that the differing compensation treatment had a rational basis.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Malachy E. Mannion
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	February 4, 2026
DOCKET	1:23-CV-1091
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved for summary judgment on a prisoner's 42 U.S.C. § 1983 class-of-one equal-protection claim concerning prison employment compensation during the COVID-19 pandemic.
STANDARD OF REVIEW	Summary judgment is appropriate when the pleadings, discovery, disclosure materials, and affidavits show no genuine dispute of material fact and the movant is entitled to judgment as a matter of law. The court must view the evidence and reasonable inferences in the light most favorable to the nonmovant and may not weigh evidence or make credibility determinations. If the nonmovant fails to establish an essential element on which he bears the burden of proof, Rule 56 requires entry of summary judgment.
PRECEDENTIAL VALUE	Unknown

TOPICS

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PRACTICE AREAS

civil rights

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QUESTIONS PRESENTED

1. Whether Hicks violated Franklin's Fourteenth Amendment equal-protection rights under a class-of-one theory by denying him the same prison employment compensation received by inmates transferred from SCI-Smithfield.
2. Whether the undisputed record established that Franklin and the SCI-Smithfield transferees were not similarly situated and that the differential treatment had a rational basis.
3. Whether summary judgment was appropriate on the basis that Franklin failed to show a genuine dispute of material fact.

HOLDINGS

1. Franklin was not similarly situated to inmates transferred from SCI-Smithfield because he underwent an ordinary administrative transfer, while those inmates were transferred as part of SCI-Smithfield's designation as the system's single entry point for parole violators and new intakes.
2. Hicks had a rational basis for denying Franklin the prior rate of pay while preserving that rate for SCI-Smithfield transferees because DOC policy and COVID-19 guidance required the different treatment.
3. Summary judgment was warranted for Hicks because the undisputed factual record established that she did not violate Franklin's equal-protection rights.

KEY QUOTATIONS

“At the summary judgment stage, “the judge’s function is not himself to weigh the evidence and determine the truth of the matter but to determine whether there is a genuine issue for trial.”” (at 4)

“Hicks therefore had a rational basis for denying Franklin the same rate of pay at SCI-Huntingdon while giving the same rate of pay to SCI-Smithfield inmates because DOC policy specifically required such differential treatment.” (at 13)

“Thus, the court concludes that Hicks did not violate Franklin’s right to equal protection because the undisputed factual record establishes that she was required to treat inmates transferred from SCI-Smithfield differently from Franklin and all other transferred inmates under the DOC’s COVID-19 guidance.” (at 14)

FACTUAL BACKGROUND

Franklin was incarcerated at SCI-Huntingdon after an administrative transfer from SCI-Dallas on December 5, 2020, and was placed in the general labor pool at the facility's compensation rate of \$0.72 per day. He claimed that Hicks wrongfully denied him the compensation he had received or expected during the COVID-19 pandemic, while inmates transferred from SCI-Smithfield received their prior rates of pay. Department of Corrections guidance treated SCI-Smithfield transfers differently because SCI-Smithfield had become the system's single point of entry for parole violators and new intakes. The court found that Franklin's transfer was

an ordinary administrative transfer governed by DC-ADM 816, which did not guarantee the same compensation at the receiving institution.

PROCEDURAL HISTORY

Vincent Franklin filed the action on June 29, 2023. The court dismissed all defendants except L. Hicks, and Franklin proceeded on a second amended complaint. After permitting additional discovery and denying an earlier summary-judgment motion without prejudice, the court considered Hicks's renewed motion for summary judgment and granted it, closing the case.

DISPOSITION

other

CASES CITED

- Celotex Corp. v. Catrett, 477 U.S. 317 (1986)
- Turner v. Schering-Plough Corp., 901 F.2d 335 (3d Cir. 1990)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242 (1986)
- Aetna Casualty & Surety Co. v. Ericksen, 903 F. Supp. 836 (M.D. Pa. 1995)
- Marino v. Industrial Crating Co., 358 F.3d 241 (3d Cir. 2004)
- Andreoli v. Gates, 482 F.3d 641 (3d Cir. 2007)
- In re Bressman, 327 F.3d 229 (3d Cir. 2003)
- Boyle v. County of Allegheny, 139 F.3d 386 (3d Cir. 1998)
- Matsushita Electric Industrial Co. v. Zenith Radio Corp., 475 U.S. 574 (1986)
- Jakimas v. Hoffman-La Roche, Inc., 485 F.3d 770 (3d Cir. 2007)
- Lake v. Arnold, 112 F.3d 682 (3d Cir. 1997)
- Baker v. McCollan, 443 U.S. 137 (1979)
- Village of Willowbrook v. Olech, 528 U.S. 562 (2000)