

SUPREME COURT OF THE UNITED STATES

Goldey v. Fields

606 U.S. 942 (2025) · No. No. 24-809 · Decided June 30, 2025

SUMMARY

The Supreme Court held that Bivens does not provide a damages remedy for an Eighth Amendment excessive-force claim against federal prison officials. The Court concluded that the claim arose in a new Bivens context and that special factors, including congressional action in prisoner litigation, potential effects on prison operations, and available alternative remedial procedures, counseled against extending Bivens. The Court granted certiorari, reversed the Fourth Circuit, and remanded.

CASE DETAILS

COURT	Supreme Court of the United States
JURISDICTION	Supreme Court of the United States
DECIDED	June 30, 2025
DOCKET	No. 24-809
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Petition for writ of certiorari to the United States Court of Appeals for the Fourth Circuit following the Court of Appeals' reversal of the District Court's dismissal of Fields's damages claims.
STANDARD OF REVIEW	Whether a Bivens remedy is available presents a question of law reviewed de novo.
PRECEDENTIAL VALUE	binding
PARTIES	Goldey, Associate Warden, et al. v. Fields et al.

TOPICS

- prisoners rights
- damages
- cruel and unusual punishment
- appellate jurisdiction
- separation of powers

PRACTICE AREAS

- constitutional law
- civil rights
- prisoner litigation
- federal courts
- remedies

QUESTIONS PRESENTED

1. Whether Bivens extends to permit an Eighth Amendment excessive-force claim for damages against federal prison officials.

HOLDINGS

1. Bivens does not extend to allow an Eighth Amendment excessive-force claim for damages against federal prison officials.

KEY QUOTATIONS

“cases have made clear that, in all but the most unusual circumstances, prescribing a cause of action is a job for Congress, not the courts.” (606 U.S. at 943)

“recognizing a cause of action under Bivens is ‘a disfavored judicial activity.’” (606 U.S. at 944)

“For the past 45 years, this Court has consistently declined to extend Bivens to new contexts.” (606 U.S. at 945)

FACTUAL BACKGROUND

Prison officials at the United States Penitentiary in Lee County, Virginia, placed Andrew Fields in solitary confinement and monitored him during his isolation. Fields alleged that officials physically abused him during periodic checks and sued the Bureau of Prisons and prison officials for damages based on excessive force in violation of the Eighth Amendment.

PROCEDURAL HISTORY

Fields sued the Bureau of Prisons, the warden, and prison officials for damages, alleging excessive force in violation of the Eighth Amendment. The United States District Court for the Western District of Virginia dismissed the complaint, holding that no Bivens remedy was available. The Fourth Circuit reversed, and after rehearing en banc was denied, the prison officials petitioned for certiorari. The Supreme Court granted certiorari, reversed, and remanded.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The case was remanded to the Fourth Circuit for further proceedings consistent with the opinion.

CASES CITED

- Bivens v. Six Unknown Fed. Narcotics Agents, 403 U.S. 388 (1971)
- Davis v. Passman, 442 U.S. 228 (1979)
- Carlson v. Green, 446 U.S. 14 (1980)
- Ziglar v. Abbasi, 582 U.S. 120 (2017)

- *Egbert v. Boule*, 596 U.S. 482 (2022)
- *Turner v. Safley*, 482 U.S. 78 (1987)
- *Correctional Services Corp. v. Malesko*, 534 U.S. 61 (2001)
- *Fields v. Federal Bureau of Prisons*, 109 F. 4th 264 (4th Cir. 2024)

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