

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Paris Williams v. Jennifer Polemitis, et al.

Williams v. Polemitis · No. 3:25-cv-02294 · Decided December 3, 2025

SUMMARY

The United States District Court for the Middle District of Pennsylvania grants Paris Williams leave to proceed in forma pauperis but dismisses his 42 U.S.C. § 1983 complaint under 28 U.S.C. § 1915(e)(2) (B)(ii). The court concludes that allegations concerning the defendants’ handling and denial of prison grievances do not establish personal involvement in an underlying constitutional violation, while granting leave to amend.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Julia K. Munley
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	December 3, 2025
DOCKET	3:25-cv-02294
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se prisoner civil-rights action under 42 U.S.C. § 1983; the complaint was before the district court for preliminary screening after the plaintiff sought leave to proceed in forma pauperis.
STANDARD OF REVIEW	The court applied the Rule 12(b)(6) failure-to-state-a-claim standard during statutory screening under 28 U.S.C. § 1915(e)(2), 28 U.S.C. § 1915A, and 42 U.S.C. § 1997e.
PRECEDENTIAL VALUE	Nonprecedential district-court memorandum

TOPICS

- section 1983
- prisoners rights
- civil rights
- motions to dismiss
- pleadings

PRACTICE AREAS

- Civil rights
- Prisoner litigation
- Federal civil procedure

QUESTIONS PRESENTED

1. Whether Williams stated a claim under 42 U.S.C. § 1983 by alleging that prison officials denied or reviewed his grievances and appeals.
2. Whether the complaint should be dismissed during preliminary screening for failure to allege the defendants' personal involvement in an underlying constitutional violation.
3. Whether Williams should be granted leave to amend the deficient complaint.

HOLDINGS

1. Allegations that prison officials denied, reviewed, or participated in the post-incident grievance process do not, without more, establish the personal involvement necessary to impose § 1983 liability for an underlying constitutional violation.
2. Inmates do not have a constitutionally protected right to a prison grievance process.
3. Leave to amend should be granted because the complaint's deficiencies were largely factual and amendment was not shown to be inequitable or futile.

KEY QUOTATIONS

“Inmates do not have a constitutional right to prison grievance procedures.”

“The filing of a grievance, participation in “after-the-fact” review of a grievance, or dissatisfaction with the response to an inmate’s grievance, do not establish the involvement of officials and administrators in any underlying constitutional deprivation.”

FACTUAL BACKGROUND

Williams, an inmate at Lackawanna County Prison, filed grievances against Grievance Coordinator Jennifer Polemitis. Polemitis deemed the grievances ungrievable because they were lodged against her, and Deputy Wardens Jason Talutto and Colleen Orzel and Warden Tim Betty denied Williams's subsequent appeals on the ground that an ungrievable grievance could not be appealed. Williams sought \$700 million and requested that the defendants be held accountable and removed from their positions.

PROCEDURAL HISTORY

Paris Williams filed a prisoner civil-rights complaint against Lackawanna County Prison officials and sought to proceed in forma pauperis. The court granted in forma pauperis status, screened the complaint, dismissed it for failure to state a claim under 28 U.S.C. § 1915(e)(2)(B)(ii), and granted leave to amend.

DISPOSITION

dismissed

REMAND INSTRUCTIONS

No remand. Williams was granted leave to file an amended complaint.

CASES CITED

- Brodzki v. Tribune Co., 481 F. App'x 705, 706 (3d Cir. 2012) (per curiam)
- Mitchell v. Dodrill, 696 F. Supp. 2d 454, 471 (M.D. Pa. 2010)
- Gonzaga Univ. v. Doe, 536 U.S. 273, 284-85 (2002)
- Kneipp v. Tedder, 95 F.3d 1199, 1204 (3d Cir. 1996)
- Mark v. Borough of Hatboro, 51 F.3d 1137, 1141 (3d Cir. 1995)
- Emil Jutrowski v. Township of Riverdale, Jutrowski v. Twp. of Riverdale, 904 F.3d 280, 289 (3d Cir. 2018)
- Rode v. Dellarciprete, 845 F.2d 1195, 1207 (3d Cir. 1988)
- Dooley v. Wetzel, 957 F.3d 366, 374 (3d Cir. 2020)
- Jackson v. Gordon, 145 F. App'x 774, 777 (3d Cir. 2005) (per curiam)
- Pressley v. Beard, 266 F. App'x 216, 218 (3d Cir. 2008)
- Brooks v. Beard, 167 F. App'x 923, 925 (3d Cir. 2006)
- Simonton v. Tennis, 437 F. App'x 60, 62 (3d Cir. 2011) (nonprecedential)
- Alexander v. Gennarini, 144 F. App'x 924, 925 (3d Cir. 2005)
- Phillips v. Allegheny Cnty., 515 F.3d 224, 245 (3d Cir. 2008)