

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
PENNSYLVANIA

Raymond Hill v. Chester County Prison

Hill v. Chester County Prison, Civ. A. No. 25-CV-5393 (E.D. Pa. Mar. 5, 2026) · No. Civil Action No. 25-CV-5393 · Decided March 5, 2026

SUMMARY

The Eastern District of Pennsylvania screened Raymond Hill’s amended 42 U.S.C. § 1983 complaint concerning his placement in restricted housing, alleged denial of hygiene products and recreation, and denial of access to criminal-case discovery and the law library. The court dismissed all claims under 28 U.S.C. § 1915(e)(2)(B)(ii), concluding that the allegations did not state plausible constitutional claims and that further amendment would be futile.

CASE DETAILS

COURT	United States District Court for the Eastern District of Pennsylvania
WRITING FOR THE COURT	John R. Padova
JURISDICTION	United States District Court for the Eastern District of Pennsylvania
DECIDED	March 5, 2026
DOCKET	Civil Action No. 25-CV-5393
DISPOSITION	dismissed
PROCEDURAL POSTURE	Screening of a pro se incarcerated plaintiff’s amended civil-rights complaint under 28 U.S.C. § 1915(e)(2)(B)(ii).
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2)(B)(ii), the court applies the same standard governing a motion to dismiss under Federal Rule of Civil Procedure 12(b)(6): accepting well-pleaded facts as true, drawing reasonable inferences for the plaintiff, and determining whether the complaint states a plausible claim for relief. Conclusory allegations are insufficient, although pro se pleadings are construed liberally.
PRECEDENTIAL VALUE	unpublished_nonprecedential
PARTIES	Raymond Hill v. Chester County Prison

TOPICS

- section 1983
- prisoners rights
- procedural due process
- first amendment
- motions to dismiss

PRACTICE AREAS

civil rights litigation

prisoner civil rights

constitutional litigation

federal civil procedure

QUESTIONS PRESENTED

1. Whether Hill's allegations regarding limited hygiene access and five days without recreation stated a Fourteenth Amendment conditions-of-confinement claim.
2. Whether Hill's placement in disciplinary segregation for five days without adequately alleged procedural protections stated a due-process claim.
3. Whether the alleged denial of access to criminal-case discovery and a law library stated a First and Fourteenth Amendment access-to-courts claim.
4. Whether claims against the Commonwealth of Pennsylvania were barred because the Commonwealth is not a person under § 1983 and is protected by Eleventh Amendment immunity.
5. Whether Hill adequately pleaded official-capacity and municipal-liability claims against Chester County and the corrections officers.

HOLDINGS

1. A pretrial detainee's alleged denial of regular hygiene products and recreation for five days, accompanied only by temporary and minimal physical effects, did not plausibly establish an unconstitutional punishment or sufficiently serious deprivation under the Fourteenth Amendment.
2. Hill did not plausibly state a due-process claim based on his five-day placement in the RHU because the placement was allegedly imposed for conduct occurring in prison, and he alleged neither an excessively long confinement nor a lack of procedural review.
3. Hill failed to state an access-to-courts claim because he did not identify with specificity a nonfrivolous underlying suppression claim, explain how the denied materials related to that claim, or show that he lacked another remedy for any alleged loss.
4. The claims against the Commonwealth of Pennsylvania were dismissed with prejudice because a state is not a person subject to suit under § 1983 and the Eleventh Amendment bars federal damages claims against a state and its agencies absent waiver.
5. The official-capacity claims and the claim against Chester County were not plausible because Hill did not plead an underlying constitutional violation or identify a county policy or custom that caused one.
6. A § 1983 plaintiff must allege the personal involvement of each defendant in the asserted constitutional violation.

KEY QUOTATIONS

“Whether a complaint fails to state a claim under § 1915(e)(2)(B)(ii) is governed by the same standard applicable to motions to dismiss under Federal Rule of Civil Procedure 12(b)(6)” (Section II)

“The underlying cause of action . . . is an element that must be described in the complaint.” (Section III.B.2)

“It therefore follows that, because Hill has failed to plead any plausible underlying constitutional violation, it is inconceivable that the claims against Chester County or Mills and Woods in their official capacities are plausible.” (Section III.C)

FACTUAL BACKGROUND

Hill, a pretrial detainee at Chester County Prison, was placed in the restricted housing unit for five days after becoming involved in a fight with another inmate. He alleged that during that period he was denied access to hygiene products, regular tooth brushing and showers, recreation, and access to criminal-case discovery and a law library before a purported suppression hearing. He also alleged that correctional officers Mills and Woods were responsible for some of those restrictions and asserted claims against the Commonwealth of Pennsylvania and Chester County.

PROCEDURAL HISTORY

Hill initially filed a § 1983 complaint and was granted leave to proceed in forma pauperis. The court dismissed the original complaint for failure to state a claim, with leave to amend. Hill filed an amended complaint naming Chester County, the Commonwealth of Pennsylvania, and two corrections officers. The court screened and dismissed the amended complaint, concluding that further amendment would be futile.

DISPOSITION

dismissed

CASES CITED

- Hill v. Chester County Prison, Civ. A. No. 25-5393, 2025 WL 3488281, at *4 (E.D. Pa. Dec. 4, 2025)
- Castro-Mota v. Smithson, Civ. A. No. 20-940, 2020 WL 3104775, at *1 n.3 (E.D. Pa. June 11, 2020)
- Buck v. Hampton Township School District, 452 F.3d 256, 260 (3d Cir. 2006)
- Jacobs v. Cumberland County, 8 F.4th 187, 193-94 (3d Cir. 2021)
- Kanu v. Lindsey, 739 F. App'x 111, 116-17 (3d Cir. 2018)
- Rapier v. Harris, 172 F.3d 999, 1003-06 (7th Cir. 1999)
- Bell v. Wolfish, 441 U.S. 520, 535, 539 (1979)
- Stevenson v. Carroll, 495 F.3d 62, 68 (3d Cir. 2007)
- Wolff v. McDonnell, 418 U.S. 539, 563-66 (1974)
- Tourscher v. McCullough, 184 F.3d 236, 240 (3d Cir. 1999)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Shorter v. United States, 12 F.4th 366, 374 (3d Cir. 2021)
- Fisher v. Hollingsworth, 115 F.4th 197 (3d Cir. 2024)
- Vogt v. Wetzel, 8 F.4th 182, 185 (3d Cir. 2021)
- Mala v. Crown Bay Marina, Inc., 704 F.3d 239, 244-45 (3d Cir. 2013)
- Will v. Michigan Department of State Police, 491 U.S. 58, 65-66 (1989)

- *Pennhurst State School and Hospital v. Halderman*, 465 U.S. 89, 99-100 (1984)
- *A.W. v. Jersey City Public Schools*, 341 F.3d 234, 238 (3d Cir. 2003)
- *Wilson v. Burks*, 423 F. App'x 169, 173 (3d Cir. 2011)
- *Edwards v. Northampton County*, 663 F. App'x 132, 135 (3d Cir. 2016)
- *Wilson v. Seiter*, 501 U.S. 294, 298 (1991)
- *Fortune v. Hamberger*, 379 F. App'x 116, 122 (3d Cir. 2010)
- *Watson v. Secretary Pennsylvania Department of Corrections*, 567 F. App'x 75, 79 (3d Cir. 2014)
- *Barndt v. Wenerowicz*, 698 F. App'x 673, 677 (3d Cir. 2017)
- *Wishon v. Gammon*, 978 F.2d 446, 449 (8th Cir. 1992)
- *Rodgers v. Jabe*, 43 F.3d 1082, 1086 (6th Cir. 1995)
- *Patterson v. Mintzes*, 717 F.2d 284, 289 (6th Cir. 1983)
- *Conklin v. Youngkin*, Civ. A. No. 24-0029, 2024 WL 289344, at *3-4 (M.D. Pa. Jan. 25, 2024)
- *Rice v. Dauphin County Prison*, Civ. A. No. 16-1021, 2016 WL 4264386, at *3 (M.D. Pa. Aug. 12, 2016)
- *Barnes v. County of Monroe*, 85 F. Supp. 3d 696, 738 (W.D.N.Y. 2015)
- *Hudson v. McMillian*, 503 U.S. 1, 9 (1992)
- *Walker v. Sorber*, Civ. A. No. 21-3477, 2022 WL 4586137, at *7 (E.D. Pa. Sept. 29, 2022)
- *Liles v. Camden County Department of Corrections*, 225 F. Supp. 2d 450, 461 (D.N.J. 2002)
- *Monroe v. Beard*, 536 F.3d 198, 205-06 (3d Cir. 2008)
- *Petlock v. Nadrowski*, Civ. A. No. 16-310, 2016 WL 7173781, at *10-11 (D.N.J. Dec. 8, 2016)
- *Tinsley v. Giorla*, 369 F. App'x 378, 381 (3d Cir. 2010)
- *Lewis v. Casey*, 518 U.S. 343, 352-54 (1996)
- *Christopher v. Harbury*, 536 U.S. 403, 415 (2002)
- *Duran v. Merline*, 923 F. Supp. 2d 702, 722-23 (D.N.J. 2013)
- *Bounds v. Smith*, 430 U.S. 817, 825 (1977)
- *Diaz v. Holder*, 532 F. App'x 61, 63 (3d Cir. 2013)
- *Prater v. City of Philadelphia*, 542 F. App'x 135, 137 n.4 (3d Cir. 2013)
- *Kentucky v. Graham*, 473 U.S. 159, 165-66 (1985)
- *Monell v. Department of Social Services*, 436 U.S. 658, 690 n.55, 694 (1978)
- *Connick v. Thompson*, 563 U.S. 51, 60 (2011)
- *Pembaur v. Cincinnati*, 475 U.S. 469, 479 (1986)
- *McTernan v. City of York, Pennsylvania*, 564 F.3d 636, 658 (3d Cir. 2009)
- *Phillips v. County of Allegheny*, 515 F.3d 224, 232 (3d Cir. 2008)
- *Mulholland v. Government County of Berks, Pennsylvania*, 706 F.3d 227, 238 n.15 (3d Cir. 2013)
- *Los Angeles v. Heller*, 475 U.S. 796, 799 (1986)
- *Jones v. Unknown D.O.C. Bus Driver & Transportation Crew*, 944 F.3d 478, 483 (3d Cir. 2019)

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