

UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT

Daniel Neil Jackson v. D. Dameron, RN; Dr. K. Smith

Jackson v. Dameron · No. 25-6295 · Decided March 30, 2026

SUMMARY

The United States Court of Appeals for the Fourth Circuit affirmed the district court’s judgment in favor of prison medical defendants in Daniel Jackson’s § 1983 action. The court held that the district court properly construed the pro se complaint as asserting Eighth Amendment deliberate-indifference claims and was not required to independently identify an Americans with Disabilities Act accommodation claim from the allegations. Judge Floyd dissented.

CASE DETAILS

COURT	United States Court of Appeals for the Fourth Circuit
WRITING FOR THE COURT	Judge Quattlebaum; Judge Agee; Senior Judge Floyd
JURISDICTION	United States Court of Appeals for the Fourth Circuit
DECIDED	March 30, 2026
DOCKET	25-6295
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from the district court's screening and subsequent dismissal, dismissal on a motion to dismiss, and grant of summary judgment in a pro se prisoner's civil-rights action. On appeal, represented by counsel, Jackson challenged only the district court's failure to construe an ADA failure-to-accommodate claim from his initial complaint.
STANDARD OF REVIEW	The court assumed without deciding that de novo review applied to the district court's identification of claims in a pro se prisoner's complaint. It noted that abuse of discretion might apply but left that question for another day. The court reviewed the § 1915A screening dismissal de novo.
PRECEDENTIAL VALUE	Published and precedential Fourth Circuit opinion; includes a dissent.
PARTIES	Daniel Neil Jackson v. D. Dameron, RN, Dr. K. Smith

TOPICS

- prisoners rights
- ada / disability
- civil rights
- pleadings
- appellate procedure

PRACTICE AREAS

prisoner civil rights

constitutional law

disability discrimination

federal appellate procedure

QUESTIONS PRESENTED

1. Whether the district court properly construed Jackson's pro se prison complaint as asserting an Eighth Amendment deliberate-indifference claim rather than also identifying an ADA failure-to-accommodate claim.
2. What standard of review applies when reviewing a district court's identification of legal claims in a pro se prisoner's complaint.

HOLDINGS

1. A district court must liberally construe a pro se prisoner's complaint and raise the strongest arguments suggested by the factual allegations, but it is not required to invent every conceivable claim or act as the litigant's legal advocate.
2. The district court did not err by construing Jackson's complaint as asserting Eighth Amendment deliberate indifference rather than an ADA failure-to-accommodate claim.
3. The court assumed without deciding that de novo review applied to the district court's determination of what claims Jackson's factual allegations presented.

KEY QUOTATIONS

"When a district court screens a pro se prisoner's complaint under the Prison Litigation Reform Act, it must construe the pleadings liberally and in favor of the strongest arguments they suggest. But that does not mean that the district court becomes the plaintiff's legal advocate; nor does it require the court to conjure up every claim imaginable from the plaintiff's allegations." (at 2)

"Thus, when the thrust of a complaint points to an 'essential grievance,' courts are not required to scour pleadings for stray phrases that could, with the benefit of hindsight, be consistent with another theory, and then construe those phrases to assert separate claims." (at 12)

"Even so, from the record in this case, the district court properly construed and addressed Mr. Jackson's essential grievance—his belief that the defendants were deliberately indifferent to his serious medical needs in violation of the Eighth Amendment." (at 21)

FACTUAL BACKGROUND

While incarcerated at Augusta Correctional Center, Daniel Jackson alleged that prison medical personnel failed to provide or maintain accommodations and treatment for pain and injuries affecting his right leg, including an ankle sleeve, bottom-bunk assignment, physical therapy, pain medication, and a medical exemption from required work boots. He alleged that the lack of accommodations and treatment caused increased pain, interfered with sleep, and forced him to leave prison employment. His initial pro se complaint described the factual circumstances without expressly identifying legal theories, and the district court construed it as asserting Eighth Amendment deliberate-indifference claims.

PROCEDURAL HISTORY

Jackson filed a pro se complaint under 42 U.S.C. § 1983 concerning medical treatment and accommodations while incarcerated. The district court screened the complaint under 28 U.S.C. § 1915A, dismissed the prison medical department as an improper § 1983 defendant, and construed the claims against the individual defendants as Eighth Amendment deliberate-indifference claims. The court later accepted a supplemental complaint, dismissed a First Amendment retaliation claim, and granted summary judgment on the deliberate-indifference claims. The Fourth Circuit affirmed, holding that the district court properly identified Jackson's essential grievance as deliberate indifference rather than an ADA claim.

DISPOSITION

affirmed

CASES CITED

- *Moretti v. Thorsdottir*, 157 F.4th 352, 356 (4th Cir. 2025)
- *Burrell v. Shirley*, 142 F.4th 239, 245 (4th Cir. 2025)
- *Erickson v. Pardus*, 551 U.S. 89, 94 (2007)
- *Beaudett v. City of Hampton*, 775 F.2d 1274, 1277-79 (4th Cir. 1985)
- *Shaw v. Foreman*, 59 F.4th 121, 127-28 (4th Cir. 2023)
- *Martin v. Duffy*, 977 F.3d 294, 298 (4th Cir. 2020)
- *United States v. Mayhew*, 995 F.3d 171, 181, 184 (4th Cir. 2021)
- *Gordon v. Leeke*, 574 F.2d 1147, 1151, 1153 (4th Cir. 1978)
- *Kerr v. Marshall Univ. Bd. of Governors*, 824 F.3d 62, 73 (4th Cir. 2016)
- *Pa. Dep't of Corr. v. Yeskey*, 524 U.S. 206, 208, 210 (1998)
- *Koon v. North Carolina*, 50 F.4th 398, 403-05 (4th Cir. 2022)
- *DePaola v. Clarke*, 884 F.3d 481, 486 (4th Cir. 2018)
- *Basta v. Novant Health Inc.*, 56 F.4th 307, 316-17 (4th Cir. 2022)
- *Johnson v. City of Shelby*, 574 U.S. 10, 11-12 (2014)
- *Nagy v. FMC Butner*, 376 F.3d 252, 254 (4th Cir. 2004)
- *Jehovah v. Clarke*, 798 F.3d 169, 176 (4th Cir. 2015)
- *Veney v. Wyche*, 293 F.3d 726, 730 (4th Cir. 2002)
- *Brock v. Carroll*, 107 F.3d 241, 245 (4th Cir. 1997) (Phillips, J., concurring in part and dissenting in part)
- *Constantine v. Rectors & Visitors of George Mason Univ.*, 411 F.3d 474, 498-99 (4th Cir. 2005)
- *Fauconier v. Clarke*, 966 F.3d 265, 280 (4th Cir. 2020)
- *Va. Off. for Prot. & Advoc. v. Reinhard*, 405 F.3d 185, 189 (4th Cir. 2005)
- *Hixson v. Moran*, 1 F.4th 297, 302 (4th Cir. 2021)
- *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009)
- *Neitzke v. Williams*, 490 U.S. 319, 326-31 (1989)

- Haines v. Kerner, 404 U.S. 519, 520-21 (1972)

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