

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
PENNSYLVANIA

Patrick Cornwall v. Delaware County, et al.

Cornwall · No. 21-2456 · Decided February 13, 2026

SUMMARY

The United States District Court for the Eastern District of Pennsylvania considers Defendants’ motion for summary judgment in Patrick Cornwall’s § 1983 action alleging constitutionally inadequate medical care while incarcerated at George W. Hill Correctional Facility. The court grants summary judgment for the individual defendants, finding insufficient evidence of deliberate indifference, but denies summary judgment for Delaware County and GEO Group on the Monell claim because disputed evidence could support a custom of delaying or improperly documenting access to seizure medication.

CASE DETAILS

COURT	United States District Court for the Eastern District of Pennsylvania
WRITING FOR THE COURT	Michael M. Baylson
JURISDICTION	United States District Court for the Eastern District of Pennsylvania
DECIDED	February 13, 2026
DOCKET	21-2456
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff brought claims under 42 U.S.C. § 1983 alleging unconstitutional denial of adequate medical care while incarcerated. The GWH Defendants moved for summary judgment.
STANDARD OF REVIEW	Summary judgment is appropriate where the record presents no genuine dispute of material fact and the moving party is entitled to judgment as a matter of law. On summary judgment, disputed factual issues and credibility questions must be resolved by the jury rather than the court.
PRECEDENTIAL VALUE	unpublished
PARTIES	Patrick Cornwall v. Delaware County, GEO Group, Inc., Jessica Wilson, Quetta Brown-Yarsiah, Shalayah Malloy, Carl Pierce

TOPICS

prisoners rights

section 1983

municipal liability

summary judgment

civil rights

PRACTICE AREAS

civil rights

constitutional law

prisoner medical care

municipal liability

civil procedure

QUESTIONS PRESENTED

1. Whether the individual medical defendants acted with deliberate indifference to Cornwall's serious medical needs in violation of the Eighth Amendment.
2. Whether the evidence could support municipal or corporate liability under Monell against Delaware County and GEO Group based on a policy or custom that delayed or denied medication for non-medical reasons and failed to document missed doses properly.
3. Whether Cornwall presented sufficient evidence of an unconstitutional policy or custom concerning treatment of his shoulder injury.

HOLDINGS

1. Summary judgment was granted for Malloy, Wilson, Brown-Yarsiah, and Pierce because Cornwall presented no evidence from which a reasonable jury could find that any of them knowingly and consciously disregarded a substantial risk of serious harm. Malloy merely signed a medication-refusal form; Wilson treated Cornwall after his seizure; Brown-Yarsiah examined him and administered medication; and Pierce referred him for physical therapy after he reported shoulder pain.
2. The Monell claim was not deficient as a matter of law. Cornwall created a genuine factual dispute over whether Delaware County and GEO Group maintained a custom of delaying narcotic medication for non-medical reasons because staff lacked a key to a locked medication box, and of failing to document missed doses properly. A reasonable jury could find that this practice created a substantial risk of serious harm and reflected deliberate indifference by policymakers.
3. The court dismissed the shoulder-related theory because Cornwall did not report the shoulder injury until August 22, 2019, after which he received extensive medical attention, and his disagreement with the treatment provided did not establish deliberate indifference.

KEY QUOTATIONS

“To state a claim under § 1983, a plaintiff must allege the violation of a right secured by the Constitution and laws of the United States, and must show that the alleged deprivation was committed by a person acting under color of state law.” (III.A)

“A jury could find that the practice of keeping medication in a locked box and failing to train medical personnel to administer the medication from the box could result in the denial of medical care causing inmates to be “incarcerated under conditions posing a substantial risk of serious harm.”” (III.B)

FACTUAL BACKGROUND

Cornwall, who was incarcerated at George W. Hill Correctional Facility, had epilepsy and was prescribed seizure medication including Luminal (phenobarbital). He missed or allegedly was denied doses on multiple occasions, experienced a seizure, and later developed shoulder pain for which medical staff provided examinations, physical therapy, imaging, and other care. Cornwall testified that medication was kept in a locked box on a medication trolley and that staff sometimes lacked the key, causing delays or requiring him to take additional steps to obtain medication. The record also contained medication-refusal entries that did not bear Cornwall's signature, creating a factual dispute about whether medication was refused by Cornwall or withheld or delayed by staff.

PROCEDURAL HISTORY

Cornwall sued Delaware County, GEO Group, Inc., and individual medical personnel under § 1983. After discovery, including depositions and submission of statements of undisputed facts, the defendants moved for summary judgment. The court granted the motion as to the individual defendants and denied it as to Cornwall's Monell claim against Delaware County and GEO Group.

DISPOSITION

other

CASES CITED

- West v. Atkins, 487 U.S. 42, 48 (1988)
- Estelle v. Gamble, 429 U.S. 97, 105 (1976)
- Natale v. Camden County Corr. Facility, 318 F.3d 575, 581–84 (3d Cir. 2003)
- Brown v. Chambersburg, 903 F.2d 274, 278 (3d Cir. 1990)
- Wilson v. Seiter, 501 U.S. 294, 298–99 (1991)
- Charleston v. Corizon Health, Inc., No. CV 17-3039, 2018 WL 1757606, at *11 (E.D. Pa. Apr. 12, 2018)
- Rouse v. Plantier, 182 F.3d 192, 197 (3d Cir. 1999)
- Pearson v. Prison Health Serv., 850 F.3d 526, 535, 538, 543 (3d Cir. 2017)
- Monmouth Cnty. Corr. Institutional Inmates v. Lanzaro, 834 F.2d 326, 346–47 (3d Cir. 1987)
- Farmer v. Brennan, 511 U.S. 825, 834–37 (1994)
- Monell v. Dep't of Soc. Servs. of City of New York, 436 U.S. 658, 694–95 (1978)
- Gannaway v. Prime Care Medical, Inc., 150 F. Supp. 3d 511, 530 (E.D. Pa. 2015)
- Thomas v. City of Philadelphia, No. CV 17-4196, 2019 WL 4039575, at *20 (E.D. Pa. Aug. 27, 2019)
- Beck v. City of Pittsburgh, 89 F.3d 966, 969–70, 973 (3d Cir. 1996)
- Durmer v. O'Carroll, 991 F.2d 64, 67 (3d Cir. 1993)
- Parkell v. Danberg, 833 F.3d 313, 338–39 (3d Cir. 2016)