

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF  
PENNSYLVANIA, ERIE DIVISION

Krista Mader v. Phamatech, Inc. and Responsible Employees, et al.

Mader · No. 1:24-CV-00318-RAL · Decided March 31, 2026

SUMMARY

The United States District Court for the Western District of Pennsylvania granted Phamatech, Inc. and related defendants’ motion to dismiss Krista Mader’s amended complaint. The court held that Mader failed to sufficiently plead the defendants’ personal involvement or intentional disparate treatment supporting a Fourteenth Amendment equal protection claim based on the denial of a drug-test retest. The claims against the Phamatech defendants were dismissed with prejudice, while the court deferred consideration of the exhaustion defense.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Western District of Pennsylvania, Erie Division                                                                                                                                                                                                                                                                                                                                                                                |
| WRITING FOR THE COURT | Richard A. Lanzillo                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| JURISDICTION          | United States District Court for the Western District of Pennsylvania, Erie Division                                                                                                                                                                                                                                                                                                                                                                                |
| DECIDED               | March 31, 2026                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| DOCKET                | 1:24-CV-00318-RAL                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| DISPOSITION           | dismissed                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| PROCEDURAL POSTURE    | Defendants moved under Federal Rule of Civil Procedure 12(b)(6) to dismiss the amended complaint. The court considered the motion as directed to the amended complaint and granted it as to the Phamatech defendants.                                                                                                                                                                                                                                               |
| STANDARD OF REVIEW    | On a Rule 12(b)(6) motion, the court accepts well-pleaded factual allegations as true, views them in the light most favorable to the plaintiff, and determines whether the complaint contains sufficient factual matter to state a facially plausible claim. Because Mader proceeded in forma pauperis, the court also applied the screening standard under 28 U.S.C. § 1915(e)(2), which uses the same Rule 12(b)(6) standard for failure-to-state-a-claim review. |
| PRECEDENTIAL VALUE    | unpublished district-court memorandum; nonprecedential                                                                                                                                                                                                                                                                                                                                                                                                              |

## PARTIES

Phamatech, Inc., Responsible Employees, et al., Tuan Pham v. Krista Mader

## TOPICS

prisoners rights

equal protection

fourteenth amendment

motions to dismiss

civil procedure

## PRACTICE AREAS

prisoner civil rights

constitutional litigation

federal civil procedure

pleading practice

## QUESTIONS PRESENTED

1. Whether the amended complaint plausibly alleged that the Phamatech defendants were personally involved in depriving Mader of a constitutional right under 42 U.S.C. § 1983.
2. Whether the amended complaint stated a Fourteenth Amendment equal-protection claim under a class-of-one theory based on the alleged denial of a urine-sample retest.
3. Whether further amendment should be permitted after Mader had already amended her complaint.

## HOLDINGS

1. The amended complaint failed to plead the Phamatech defendants' personal involvement in the alleged constitutional deprivation because it alleged only that Phamatech informed Mader's family that the DOC had to request a retest, without alleging that the defendants participated in, directed, knew of, or acquiesced in the prison officials' conduct.
2. The amended complaint failed to state a class-of-one equal-protection claim against the Phamatech defendants because it did not plausibly allege intentional and arbitrary disparate treatment by those defendants.
3. Further amendment was futile, and the Fourteenth Amendment claims against the Phamatech defendants were properly dismissed with prejudice.

## KEY QUOTATIONS

*“To establish an Equal Protection Clause violation, a plaintiff must ordinarily allege “that he was treated differently than other similarly situated inmates, and that this different treatment was the result of intentional discrimination based on his membership in a protected class.”” (at 9)*

*“This requires her to establish that: “(1) the defendant treated h[er] differently from others similarly situated, (2) the defendant did so intentionally, and (8) there was no rational basis for the difference in treatment.”” (at 10)*

*“Accordingly, given the nature of Mader’s allegations and the claims alleged, and considering that Mader has previously been put on notice of the defects in her pleading via Defendants’ motions to dismiss and permitted to file an amendment, the Court finds it would be futile to allow Mader to file another amended complaint with respect to her Fourteenth Amendment claims against Phamatech Defendants.” (at 12)*

## FACTUAL BACKGROUND

Mader, an inmate at SCI-Cambridge Springs, received a positive marijuana urinalysis in December 2023 and was sanctioned with confinement and loss of visitation and work privileges. She requested a retest, but prison officials allegedly refused, while another inmate, J. Swick, was allegedly permitted an immediate retest. Mader alleged that Phamatech told her family that it did not perform testing for private citizens and that the DOC had to request any retest. She asserted equal-protection and liberty-interest claims against the Phamatech defendants.

## PROCEDURAL HISTORY

Mader, a Pennsylvania Department of Corrections inmate proceeding pro se, filed a civil-rights action concerning the denial of a retest after a positive urinalysis. The court permitted her to file an amended complaint. Although the defendants also raised failure to exhaust administrative remedies, the court deferred that issue because it involved factual and legal complexity and dismissed the claims on the merits under Rule 12(b)(6).

## DISPOSITION

dismissed

## CASES CITED

- Kost v. Kozakiewicz, 1 F.3d 176, 183 (3d Cir. 1993)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555 n.3, 570 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 677-78 (2009)
- U.S. Express Lines Ltd. v. Higgins, 281 F.3d 383, 388 (3d Cir. 2002)
- Baraka v. McGreevey, 481 F.3d 187, 195, 210 (3d Cir. 2007)
- Mayer v. Belichick, 605 F.3d 223, 230 (3d Cir. 2010)
- Muchler v. Greenwald, 624 F. App'x 794, 796 (8th Cir. 2015)
- Banks v. County of Allegheny, 568 F. Supp. 2d 579, 588-89 (W.D. Pa. 2008)
- Schreane v. Seana, 506 F. App'x 120, 122 (3d Cir. 2012)
- Haines v. Kerner, 404 U.S. 519, 520 (1972)
- Denton v. Hernandez, 504 U.S. 25, 32 (1992)
- Boag v. MacDougall, 454 U.S. 364, 365 (1982)
- Mala v. Crown Bay Marina, Inc., 704 F.3d 239, 245 (3d Cir. 2013)
- Rinaldi v. United States, 904 F.3d 257, 265 (3d Cir. 2018)
- Woodford v. Ngo, 548 U.S. 81, 101 (2006)
- Perttu v. Richards, 605 U.S. 460, 469 (2025)
- Amig v. County of Juniata, 432 F. Supp. 3d 481, 485-87 (M.D. Pa. 2020)
- Groman v. Township of Manalapan, 47 F.3d 628, 633 (3d Cir. 1995)
- Gomez v. Toledo, 446 U.S. 635, 640 (1980)
- Kirk v. Roan, 2006 WL 2645154, at \*3 (M.D. Pa. 2006)

- *Evancho v. Fischer*, 423 F.3d 347, 353 (3d Cir. 2005)
- *Igbal*, 556 U.S. at 677
- *Rode v. Dellarciprete*, 845 F.2d 1195, 1207 (3d Cir. 1988)
- *Mearin v. Swartz*, 951 F. Supp. 2d 776, 782 (W.D. Pa. 2013)
- *Theron v. County of York*, 2012 WL 425259, at \*3 (M.D. Pa. Feb. 9, 2012)
- *Carroll v. Delaware County*, 2023 WL 2868020, at \*19 (E.D. Pa. Apr. 10, 2023)
- *Mack v. Warden Loretto FCI*, 839 F.3d 286, 305 (3d Cir. 2016)
- *Hill v. Borough of Kutztown*, 455 F.3d 225, 239 (3d Cir. 2006)
- *Hammond v. Zaken*, 2024 WL 3593487, at \*2 (W.D. Pa. July 31, 2024)
- *Harris v. Thompson*, 2026 WL 237606, at \*8 (W.D. Pa. Jan. 29, 2026)
- *Bailey v. Kauffman*, 2021 WL 5846942, at \*6 (M.D. Pa. Dec. 9, 2021), *aff'd*, 2022 WL 11151386 (3d Cir. Apr. 14, 2022)
- *Van Tassel v. Piccione*, 608 F. App'x 66, 69-70 (3d Cir. 2015)
- *Williams v. Pa. Dep't of Corr.*, 2023 WL 2655406, at \*9 (W.D. Pa. Feb. 2, 2023), report and recommendation adopted, 2023 WL 2652298 (W.D. Pa. Mar. 27, 2023)
- *Alston v. Parker*, 363 F.3d 229, 235 (3d Cir. 2004)
- *Baker v. Moon Area Sch. Dist.*, 2018 WL 4057179, at \*8 (W.D. Pa. Aug. 27, 2018)
- *Lake v. Arnold*, 232 F.3d 360, 373-74 (3d Cir. 2000)
- *Jones v. City of Philadelphia Hous. Dep't*, 573 F. App'x 138, 139 (3d Cir. 2014)