

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
PENNSYLVANIA

Robert Robinson v. Anthony Letizio, et al.

Robinson · No. 2:25-cv-06091 · Decided February 19, 2026

SUMMARY

The United States District Court for the Eastern District of Pennsylvania grants Robert Robinson leave to proceed in forma pauperis but dismisses his claims concerning medical care at SCI Phoenix. Claims regarding his back brace and MRI denials are dismissed with prejudice as time-barred, while his remaining constitutional, state-law, conspiracy, and Wellpath policy claims are dismissed without prejudice, with leave to amend. The court also denies his request for injunctive relief without prejudice.

CASE DETAILS

COURT	United States District Court for the Eastern District of Pennsylvania
WRITING FOR THE COURT	Wendy Beetlestone, Chief Judge
JURISDICTION	United States District Court for the Eastern District of Pennsylvania
DECIDED	February 19, 2026
DOCKET	2:25-cv-06091
DISPOSITION	other
PROCEDURAL POSTURE	Screening of a pro se prisoner's complaint under 28 U.S.C. § 1915(e)(2)(B)(ii), following the grant of leave to proceed in forma pauperis.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2)(B)(ii), the court applies the same plausibility standard governing Rule 12(b)(6) motions, accepts well-pleaded factual allegations as true, draws reasonable inferences in the plaintiff's favor, and construes a pro se complaint liberally. A court may dismiss sua sponte on statute-of-limitations grounds when the time bar is apparent on the face of the complaint. Subject-matter jurisdiction may also be considered sua sponte at any time.
PRECEDENTIAL VALUE	nonprecedential

TOPICS

- section 1983
- prisoners rights
- motions to dismiss
- statute of limitations
- subject matter jurisdiction

PRACTICE AREAS

civil rights

prisoner medical care

constitutional litigation

civil procedure

federal jurisdiction

QUESTIONS PRESENTED

1. Whether Robinson's claims based on confiscation of his back brace and denials of back MRIs in 2019 and early 2023 were barred by Pennsylvania's two-year statute of limitations.
2. Whether Robinson plausibly alleged an Eighth Amendment deliberate-indifference claim based on the rescission of his bottom-bunk status and refusal to change his pain medication.
3. Whether Robinson plausibly alleged a § 1983 conspiracy claim.
4. Whether Robinson plausibly alleged that Wellpath was liable under § 1983 based on a policy or custom causing a constitutional violation.
5. Whether official-capacity claims against employees of Wellpath were cognizable or duplicative.
6. Whether the court had supplemental or diversity jurisdiction over Robinson's state-law negligence claims.

HOLDINGS

1. Claims based on the confiscation of Robinson's back brace and the denials of MRIs in 2019 and early 2023 were time-barred and were dismissed with prejudice.
2. Robinson failed to plausibly allege deliberate indifference based on rescission of bottom-bunk status, refusal to change his medication, or the alleged failure to schedule an MRI, and those claims were dismissed without prejudice with leave to amend.
3. Robinson's conspiracy allegation was insufficient because it was bare, conclusory, and lacked facts from which a conspiratorial agreement could be inferred; the claim was dismissed without prejudice with leave to amend.
4. Robinson's claim against Wellpath could not proceed because he failed to plausibly allege an underlying constitutional violation, and it was dismissed without prejudice with leave to amend.
5. The official-capacity claims against Letizio, Huner, and Bora were not cognizable or were duplicative of the claim against Wellpath and were dismissed with prejudice.
6. The court declined supplemental jurisdiction over Robinson's state-law negligence claims and dismissed them without prejudice because Robinson failed to establish complete diversity and the amount-in-controversy requirement.

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), see Tourscher v. McCullough, 184 F.3d 236, 240 (3d Cir. 1999), which requires the Court to determine whether the complaint contains “sufficient factual matter, accepted as true, to state a claim to relief that is plausible on its face.””

(II)

“A prison official is not deliberately indifferent “unless the official knows of and disregards an excessive risk to inmate health or safety; the official must both be aware of facts from which the inference could be drawn that a substantial risk of serious harm exists, and he must also draw the inference.”” (III.B)

“Rather, in order to hold a private health care company like Wellpath liable for a constitutional violation under § 1983, Robinson must allege the provider had “a relevant . . . policy or custom, and that the policy caused the constitutional violation [he] allege[s].”” (III.C)

FACTUAL BACKGROUND

Robinson, a convicted prisoner at SCI Phoenix, alleged that prison medical personnel and Wellpath failed for years to provide an MRI for worsening back pain and related symptoms, including numbness, difficulty walking, and urinary incontinence. He also alleged that his previously approved back brace was confiscated, his bottom-bunk status was rescinded, and a provider refused to change ineffective pain medication while making allegedly racially motivated remarks. The complaint alleged that Wellpath maintained a cost-saving policy limiting outside medical care.

PROCEDURAL HISTORY

Robert Robinson filed a pro se § 1983 complaint alleging deliberate indifference to serious medical needs, claims against a private medical contractor, and related state-law negligence claims. The court granted in forma pauperis status, dismissed some claims with prejudice, dismissed the remaining constitutional and state-law claims without prejudice, denied injunctive relief without prejudice, and granted leave to amend.

DISPOSITION

other

CASES CITED

- Hubbard v. Taylor, 399 F.3d 150, 166 (3d Cir. 2005)
- Parkell v. Morgan, 682 F. App’x 155, 159 (3d Cir. 2017) (per curiam)
- Moore v. Luffey, No. 18-1716, 2019 WL 1766047, at *3 n.2 (3d Cir. Apr. 19, 2019)
- Tourscher v. McCullough, 184 F.3d 236, 240 (3d Cir. 1999)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Talley v. Wetzel, 15 F.4th 275, 286 n.7 (3d Cir. 2021)
- Shorter v. United States, 12 F.4th 366, 374 (3d Cir. 2021)
- Fisher v. Hollingsworth, 115 F.4th 197 (3d Cir. 2024)
- Wisniewski v. Fisher, 857 F.3d 152, 157 (3d Cir. 2017)
- 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)
- Group Against Smog and Pollution, Inc. v. Shenango, Inc., 810 F.3d 116, 122 n.6 (3d Cir. 2016)
- Lincoln Benefit Life Co. v. AEI Life, LLC, 800 F.3d 99, 105 (3d Cir. 2015)

- DaimlerChrysler Corp. v. Cuno, 547 U.S. 332, 342 n.3 (2006)
- West v. Atkins, 487 U.S. 42, 48 (1988)
- Rode v. Dellarciprete, 845 F.2d 1195, 1207 (3d Cir. 1988)
- Dooley v. Wetzel, 957 F.3d 366, 374 (3d Cir. 2020)
- Wallace v. Kato, 549 U.S. 384, 387 (2007)
- Dique v. N.J. State Police, 603 F.3d 181, 185 (3d Cir. 2010)
- Sameric Corp. of Del. v. City of Philadelphia, 142 F.3d 582, 599 (3d Cir. 1998)
- Hickox v. County of Blair, 591 F. App'x 107, 110 (3d Cir. 2014) (per curiam)
- Houston v. Lack, 487 U.S. 266, 276 (1988)
- Moody v. Conroy, 680 F. App'x 140, 144 (3d Cir. 2017) (per curiam)
- Ostuni v. WaWa's Mart, 532 F. App'x 110, 111-12 (3d Cir. 2013) (per curiam)
- Harris v. Stash, No. 22-1910, 2023 WL 1990531, at *2 (3d Cir. Feb. 14, 2023) (per curiam)
- Farmer v. Brennan, 511 U.S. 825, 837 (1994)
- Monmouth Cnty. Corr. Institutional Inmates v. Lanzaro, 834 F.2d 326, 347 (3d Cir. 1987)
- Rouse v. Plantier, 182 F.3d 192, 197 (3d Cir. 1999)
- Colburn v. Upper Darby Township, 946 F.2d 1017, 1023 (3d Cir. 1991)
- Estelle v. Gamble, 429 U.S. 97, 102 (1976)
- Anderson v. Price, No. 22-3058, 2023 WL 5814664, at *2 (3d Cir. Sept. 8, 2023) (per curiam)
- Brown v. Borough of Chambersburg, 903 F.2d 274, 278 (3d Cir. 1990)
- Hayes v. Gilmore, 802 F. App'x 84, 88 (3d Cir. 2020) (per curiam)
- Davis v. Superintendent Somerset SCI, 597 F. App'x 42, 45 (3d Cir. 2015) (per curiam)
- United States ex rel. Walker v. Fayette County, 599 F.2d 573, 575 n.2 (3d Cir. 1979)
- Ryle v. Fuh, 820 F. App'x 121, 123-24 (3d Cir. 2020)
- Saunders v. GEO Grp., Inc., No. 19-2322, 2019 WL 5558659, at *4 (E.D. Pa. Oct. 25, 2019)
- Whitehead v. Wetzel, No. 14-51, 2016 WL 356809, at *7 (W.D. Pa. June 2, 2016)
- Wall v. Bushman, 639 F. App'x 92, 95 (3d Cir. 2015)
- Guilfoil v. Pierce, No. 06-493, 2009 WL 688957, at *5 (D. Del. Mar. 16, 2009)
- Emil Jutrowski v. Township of Riverdale, Jutrowski v. Township of Riverdale, 904 F.3d 280, 294 (3d Cir. 2018)
- Great W. Mining & Mineral Co. v. Fox Rothschild LLP, 615 F.3d 159, 178 (3d Cir. 2010)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 556 (2007)
- Sims v. Wexford Health Sources, 635 F. App'x 16, 20 (3d Cir. 2015)
- Natale v. Camden Cnty. Corr. Facility, 318 F.3d 575, 583-84 (3d Cir. 2003)
- Board of the County Commissioners v. Brown, 520 U.S. 397, 404 (1997)
- Lomax v. City of Philadelphia, No. 13-1078, 2017 WL 1177095, at *3 (E.D. Pa. Mar. 29, 2017)
- Brown v. Delaware Cnty. Prison Bd. of Inspectors, 741 F. App'x 135, 138 (3d Cir. 2018) (per curiam)
- Forrest v. Parry, 930 F.3d 93, 106 (3d Cir. 2019)

- Ponzini v. PrimeCare Med., Inc., 269 F. Supp. 3d 444, 526 (M.D. Pa. 2017)
- Ponzini v. Monroe County, 789 F. App'x 313 (3d Cir. 2019)
- Mulholland v. Gov't Cnty. of Berks, Pa., 706 F.3d 227, 238 n.15 (3d Cir. 2013)
- Kreis v. Northampton Cnty. Prison, No. 21-2360, 2022 WL 4236692, at *8 (E.D. Pa. Sept. 14, 2022)
- Owens v. Connections Cmty. Support Programs, Inc., 840 F. Supp. 2d 791, 796 (D. Del. 2012)
- Graham v. Connor, 473 U.S. 159, 165 (1985)
- Lincoln Benefit Life Co. v. AEI Life, LLC, 800 F.3d 99, 104 (3d Cir. 2015)
- Lincoln Property Co. v. Roche, 546 U.S. 81, 89 (2005)
- Zambelli Fireworks Mfg. Co. v. Wood, 592 F.3d 412, 419-20 (3d Cir. 2010)
- Washington v. Hovensa LLC, 652 F.3d 340, 344 (3d Cir. 2011)
- Pierro v. Kugel, 386 F. App'x 308, 309 (3d Cir. 2010)
- Hertz Corp. v. Friend, 559 U.S. 77, 80-81 (2010)
- Gibbs v. Buck, 307 U.S. 66, 72 (1939)
- Quaker State Dyeing & Finishing Co., Inc. v. ITT Terryphone Corp., 461 F.2d 1140, 1143 (3d Cir. 1972)
- Jackson v. Rosen, No. 20-2842, 2020 WL 3498131, at *8 (E.D. Pa. June 26, 2020)
- Grayson v. Mayview State Hosp., 293 F.3d 103, 108, 110 (3d Cir. 2002)