

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WISCONSIN

Ralph H. Jurjens, III v. Justin S. Ribault

Jurjens v. Ribault · No. 23-cv-88-jdp · Decided March 30, 2026

SUMMARY

The United States District Court for the Western District of Wisconsin denied Ralph H. Jurjens, III’s motion for reconsideration of the grant of summary judgment to Dr. Justin Ribault on Jurjens’s Eighth Amendment medical-care claim. The court concluded that Jurjens identified neither newly discovered evidence nor a manifest error of law or fact, and that his arguments concerning discovery and allegedly inaccurate medical records did not warrant reconsideration.

CASE DETAILS

COURT	United States District Court for the Western District of Wisconsin
WRITING FOR THE COURT	James D. Peterson
JURISDICTION	United States District Court for the Western District of Wisconsin
DECIDED	March 30, 2026
DOCKET	23-cv-88-jdp
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved under Federal Rules of Civil Procedure 59(e) or 60(b) for reconsideration of the court's prior order granting summary judgment to defendant on plaintiff's Eighth Amendment claim and relinquishing jurisdiction over his state-law medical malpractice claim.
STANDARD OF REVIEW	A motion for reconsideration under Rule 59(e) requires newly discovered evidence or a manifest error of law or fact. The court assumed, without deciding, that the more lenient Rule 59 standard applied rather than Rule 60(b).
PRECEDENTIAL VALUE	unpublished

TOPICS

- motion for reconsideration
- summary judgment
- discovery dispute
- prisoners rights
- civil rights

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Jurjens's motion for reconsideration satisfied the applicable Rule 59(e) or Rule 60(b) standard.
2. Whether the court committed a manifest error by refusing to extend summary-judgment briefing based on Jurjens's late discovery motion.
3. Whether alleged inaccuracies or falsity in medical-record evidence warranted reconsideration of summary judgment on the Eighth Amendment claim.

HOLDINGS

1. The motion for reconsideration was properly denied because Jurjens presented neither newly discovered evidence nor a manifest error of law or fact.
2. The court did not commit a manifest error by treating Jurjens's motion to compel as moot after granting summary judgment and by declining to further extend summary-judgment briefing.
3. Allegations that the underlying medical records inaccurately described an overdose did not warrant reconsideration because Jurjens presented no new evidence that the records or evidence had been fabricated or were inaccurate.

KEY QUOTATIONS

“must present either newly discovered evidence or establish a manifest error of law or fact.”

FACTUAL BACKGROUND

Jurjens, an incarcerated plaintiff, alleged that staff at Columbia Correctional Institution failed to adequately treat his seizure disorder. After the court granted summary judgment to Dr. Ribault, Jurjens sought reconsideration based primarily on the timeliness of his interrogatories and requests for production and on an allegation that medical records concerning an overdose were inaccurate. He presented no new evidence supporting either contention.

PROCEDURAL HISTORY

The court previously granted summary judgment to Dr. Justin Ribault on Jurjens's Eighth Amendment claim and relinquished jurisdiction over the state-law medical malpractice claim. Jurjens then moved for reconsideration, arguing that the court mishandled discovery and that medical-record evidence concerning an overdose was false or inaccurate. The court denied reconsideration.

DISPOSITION

other

CASES CITED

- *Oto v. Metro. Life Ins. Co.*, 224 F.3d 601, 606 (7th Cir. 2000)

OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WISCONSIN RALPH H. JURJENS, III, Plaintiff, ORDER v. 23-cv-88-jdp JUSTIN S. RIBAUT, Defendant. Plaintiff Ralph H. Jurjens, III, proceeding without counsel, is currently incarcerated at New Lisbon Correctional Institution. Jurjens alleges that when he was at Columbia Correctional Institution, staff failed to adequately treat his seizure disorder.

I granted summary judgment to defendant Dr. Justin Ribault on Jurjens's Eighth Amendment claim against him, and I relinquished jurisdiction over Jurjens's state-law medical malpractice claim against him. Dkt. 83. Jurjens moves for reconsideration of that decision. Dkt. 85. I will deny that motion. ANALYSIS The parties dispute whether Jurjens's motion should be considered under Federal Rules of Civil Procedure 59(e) or 60(b); Jurjens argues that his ability to file a Rule 59 motion within 28 days of the entry of judgment was affected by delays both in him receiving the judgment and in mailing his motion to the court.

But even assuming that the more lenient Rule 59 standard applies to Jurjens's motion, I would deny it. To prevail under that standard Jurjens "must present either newly discovered evidence or establish a manifest error of law or fact." *Oto v. Metro. Life Ins. Co.*, 224 F.3d 601, 606 (7th Cir. 2000). Jurjens's motion largely focuses on whether he timely served Ribault with interrogatories and requests for production of documents.

But that discovery question was irrelevant to my summary judgment ruling; I had previously explained to Jurjens that his motion to compel discovery concerning these requests came too late to further extend summary judgment briefing and that Jurjens should respond to Ribault's summary judgment motions with the materials that he had already acquired. Dkt. 77 and Dkt.

83, at 9. Given this rationale and my grant of summary judgment to Ribault, I denied Jurjens's motion to compel as moot. Nothing in Jurjens's current motion persuades me that I was incorrect in handling his late-filed motion to compel. Jurjens otherwise argues that my substantive decision on his Eighth Amendment claims was in error because defense counsel submitted "false evidence" about an overdose that he says didn't occur.

But he doesn't submit anything suggesting that this evidence was fabricated by counsel. Rather, I take him to be saying that the underlying medical records didn't accurately recount the events of the case. He doesn't present any new evidence supporting this argument. He otherwise could have made this argument by opposing Ribault's motion for summary judgment, but he didn't file any opposition materials.

Nothing in his current motion persuades me that I erred in granting summary judgment to Ribault. So I will deny Jurjens's motion for reconsideration. ORDER IT IS ORDERED that plaintiff's

motion for reconsideration, Dkt. 85, is DENIED. Entered March 30, 2026. BY THE COURT: /s/
_____ JAMES D. PETERSON District Judge

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