

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
IOWA, WESTERN DIVISION

Marvin Lynn Hildreth, Jr. v. Chad Sheehan, et al.

Hildreth · No. No. C23-4010-LTS · Decided April 21, 2026

SUMMARY

The document is a memorandum opinion and order addressing defendants’ motion for summary judgment in Marvin Lynn Hildreth, Jr.’s 42 U.S.C. § 1983 action against officials and employees of the Woodbury County Jail. The claims concern religious exercise, legal mail, retaliation, failure to protect, and failure to train or supervise. The defendants also argue that Hildreth failed to exhaust administrative remedies and that qualified immunity applies.

CASE DETAILS

COURT	United States District Court for the Northern District of Iowa, Western Division
WRITING FOR THE COURT	Leonard T. Strand
JURISDICTION	United States District Court for the Northern District of Iowa, Western Division
DECIDED	April 21, 2026
DOCKET	No. C23-4010-LTS
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendants moved for summary judgment on the plaintiff's remaining 42 U.S.C. § 1983 claims. The court granted the motion in its entirety and dismissed all claims with prejudice.
STANDARD OF REVIEW	Summary judgment is appropriate when the record shows no genuine dispute of material fact and the moving party is entitled to judgment as a matter of law. The court views the evidence and reasonable inferences in the light most favorable to the nonmoving party but does not weigh evidence or determine witness credibility. The plaintiff must designate specific facts showing a genuine issue for trial after the movant meets its initial burden.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Marvin Lynn Hildreth, Jr. v. Chad Sheehan, Todd Harlow, Randy Uhl, Mary Feiler, Willis Strawn, Steve Pickering, Katelyn Speed, Carlos

TOPICS

prisoners rights section 1983 summary judgment free exercise clause civil procedure

PRACTICE AREAS

civil rights prisoner litigation constitutional law civil procedure

QUESTIONS PRESENTED

1. Whether defendants were entitled to summary judgment on Hildreth's First Amendment free exercise claims based on clergy visits and delayed access to a religious book.
2. Whether defendants were entitled to summary judgment on Hildreth's First Amendment legal-mail claim.
3. Whether Hildreth produced evidence that jail lockdowns were imposed in retaliation for protected grievance activity.
4. Whether jail officials were deliberately indifferent to a substantial risk of serious harm in violation of the applicable constitutional standard governing failure-to-protect claims.
5. Whether Hildreth's failure-to-train and failure-to-supervise claims could proceed absent an underlying constitutional violation or evidence of deliberate indifference or tacit authorization.
6. Whether Hildreth exhausted all available administrative remedies as required by the Prison Litigation Reform Act.

HOLDINGS

1. Brief delays and two missed visits by personal clergy did not substantially burden Hildreth's ability to practice his religion, particularly where other reasonable opportunities to meet with clergy remained available and the alleged failures involved negligent mistakes in implementing jail policy.
2. A six-day delay in access to a religious book did not substantially burden Hildreth's free exercise rights where he could exchange another book for it at the next weekly distribution and the two-book policy did not restrict which books he could possess.
3. Hildreth failed to create a genuine dispute that jail officials opened his confidential legal mail outside his presence or did so deliberately; alternatively, an isolated inadvertent opening without improper motive, prejudice, or interference with counsel or court access would not support a § 1983 claim.
4. Hildreth's retaliation claim failed because the undisputed evidence showed that each lockdown followed an actual jail-rule violation, not retaliation for filing grievances.
5. Hildreth failed to show deliberate indifference because the record did not establish that defendants subjectively knew of a substantial risk that Lawson would attack him, and officials responded reasonably once the fight began.

6. The failure-to-train and failure-to-supervise claims failed because there was no underlying constitutional violation, no evidence of deliberate indifference or tacit authorization, and Hildreth failed to oppose defendants' arguments.
7. Hildreth failed to exhaust all available administrative remedies because he did not appeal any grievance to the jail's Chief Deputy as required by the grievance procedure.

KEY QUOTATIONS

“ “[An inmate’s] retaliation claim is precluded [when] the punishment in question was imposed against him based on an actual violation of prison rules.” ” (Section V.A.3)

“ “Exhaustion ‘means using all steps that the agency holds out, and doing so properly (so that the agency addresses the issues on the merits).’ ” ” (Section V.B)

“All claims asserted in this case by plaintiff Marvin Hildreth are dismissed with prejudice.” (Conclusion)

FACTUAL BACKGROUND

Hildreth was confined at the Woodbury County Jail from May 31, 2021, until June 13, 2022, and remained incarcerated at the time of decision. He alleged that jail officials interfered with visits by his personal clergy, delayed access to a religious book, mishandled legal mail, retaliated against him through lockdowns, and failed to protect him from an assault by another inmate. The record showed that the lockdowns followed rule violations, that legal mail was opened in Hildreth's presence, that clergy access was available through jail procedures, and that the assault was a surprise incident stopped within approximately 45 seconds.

PROCEDURAL HISTORY

The court treated several filings as Hildreth's complaint, permitted an individual-capacity claim against Cara Newman, and dismissed official-capacity claims at initial review. The parties later identified six categories of remaining claims: free exercise, legal mail, retaliation, failure to protect, and failure to train or supervise. On defendants' motion for summary judgment, the court concluded that the claims failed on the merits and, alternatively, that Hildreth failed to exhaust available administrative remedies under the PLRA.

DISPOSITION

dismissed

CASES CITED

- Celotex Corp. v. Catrett, 477 U.S. 317, 322-23 (1986)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248-50 (1986)
- Matsushita Electric Industrial Co. v. Zenith Radio Corp., 475 U.S. 574, 586-88 (1986)
- Monell v. Department of Social Services, 436 U.S. 658, 685 (1978)
- Albright v. Oliver, 510 U.S. 266, 271 (1994)
- Graham v. Connor, 490 U.S. 386, 393-94 (1989)

- West v. Atkins, 487 U.S. 42, 48 (1988)
- United States v. Slabaugh, 655 F. Supp. 462, 463 (D. Minn. 1987), aff'd, 852 F.2d 1081 (8th Cir. 1988)
- Patel v. U.S. Bureau of Prisons, 515 F.3d 807, 813 (8th Cir. 2008)
- Holt v. Hobbs, 574 U.S. 352, 361 (2015)
- Moon v. Boyd, 727 F. Supp. 3d 829, 837, 847-49 (E.D. Mo. 2024)
- Weir v. Nix, 114 F.3d 817, 820 (8th Cir. 1997)
- Turner v. Safley, 482 U.S. 78, 89 (1987)
- Gladson v. Iowa Department of Corrections, 551 F.3d 825, 832 (8th Cir. 2009)
- McCroy v. Douglas County Correctional Center, 394 F. App'x 325, 325 (8th Cir. 2010)
- Neusteter v. Cossobone, 62 F. App'x 844, 845-46 (10th Cir. 2003)
- Thornburgh v. Abbott, 490 U.S. 401, 407-08 (1989)
- Goff v. Nix, 113 F.3d 887, 892 (8th Cir. 1997)
- Jensen v. Klecker, 648 F.2d 1179, 1182 (8th Cir. 1981)
- Beaulieu v. Ludeman, 690 F.3d 1017, 1037 (8th Cir. 2012)
- Gardner v. Howard, 109 F.3d 427, 430-31 (8th Cir. 1997)
- Risdal v. Nixon, 589 F. App'x 801, 803 (8th Cir. 2014)
- Spencer v. Jackson County, 738 F.3d 907, 911, 913 (8th Cir. 2013)
- Earnest v. Courtney, 64 F.3d 365, 367 (8th Cir. 1995)
- Goff v. Burton, 7 F.3d 734, 738 (8th Cir. 1993)
- Farmer v. Brennan, 511 U.S. 825, 832, 844 (1994)
- Holden v. Hirner, 663 F.3d 336, 341-42 (8th Cir. 2011)
- Walton v. Dawson, 752 F.3d 1109, 1114-15, 1119, 1124 (8th Cir. 2014)
- Rogers v. King, 885 F.3d 1118, 1122 (8th Cir. 2018)
- Tilson v. Forrest City Police Department, 28 F.3d 802, 806 (8th Cir. 1994)
- City of Canton v. Harris, 489 U.S. 378, 388 (1989)
- Atkinson v. City of Mountain View, 709 F.3d 1201, 1216 (8th Cir. 2013)
- Royster v. Nichols, 698 F.3d 681, 693 (8th Cir. 2012)
- Porter v. Nussle, 534 U.S. 516, 532 (2002)
- Woodford v. Ngo, 548 U.S. 81, 90, 93-95 (2006)
- Booth v. Churner, 532 U.S. 731, 741 (2001)
- Ross v. Blake, 578 U.S. 632, 638 (2016)
- Jones v. Bock, 549 U.S. 199, 218 (2007)
- Gibson v. Weber, 431 F.3d 339, 341 (8th Cir. 2005)
- Johnson v. Jones, 340 F.3d 624, 627 (8th Cir. 2003)
- Porter v. Sturm, 781 F.3d 448, 451-52 (8th Cir. 2015)
- Satcher v. University of Arkansas at Pine Bluff Board of Trustees, 558 F.3d 731, 735 (8th Cir. 2009)

