

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
PENNSYLVANIA

Darien Houser v. Anthony Letizio, Superintendent J. Terra, Joseph
Walsh, CHCA Huner, Deputy Sipple, Deputy Hensley, Jane/John
Doe, Jane/John Doe Bureau of Health Care Services Final Decision
Makers

Houser · No. 25-1875 · Decided February 27, 2026

SUMMARY

The United States District Court for the Eastern District of Pennsylvania addresses Darien Houser’s third round of Eighth Amendment claims alleging deliberate indifference to serious medical needs by SCI-Phoenix officials and medical personnel. The court limits claims to conduct within the applicable two-year limitations period, dismisses certain claims as unexhausted or insufficiently pleaded, and allows specifically identified claims against several facility officials and Dr. Letizio to proceed into discovery. Claims against Physician Assistant Walsh are dismissed.

CASE DETAILS

COURT	United States District Court for the Eastern District of Pennsylvania
WRITING FOR THE COURT	Mark A. Kearney
JURISDICTION	United States District Court for the Eastern District of Pennsylvania
DECIDED	February 27, 2026
DOCKET	25-1875
DISPOSITION	other
PROCEDURAL POSTURE	On motions to dismiss the consolidated amended and second amended claims in an incarcerated person's action under 42 U.S.C. § 1983 alleging deliberate indifference to serious medical needs in violation of the Eighth Amendment.
STANDARD OF REVIEW	On a motion to dismiss, the court liberally construed the pro se allegations and determined whether they plausibly stated a claim. Exhaustion could be considered on a motion to dismiss when it turned on indisputably authentic grievance documents.
PRECEDENTIAL VALUE	unpublished

PARTIES

Darien Houser v. Anthony Letizio, Superintendent J. Terra, Joseph Walsh, CHCA Huner, Deputy Sipple, Deputy Hensley, Jane/John Doe, Jane/John Doe Bureau of Health Care Services Final Decision Makers

TOPICS

motions to dismiss

statute of limitations

prisoners rights

section 1983

civil procedure

PRACTICE AREAS

civil rights

prisoner litigation

constitutional law

health law

civil procedure

QUESTIONS PRESENTED

1. Whether claims based on events before April 7, 2023 were barred by the statute of limitations.
2. Whether the claims were barred for failure to properly exhaust available administrative remedies under the Prison Litigation Reform Act and the Pennsylvania Department of Corrections grievance procedures.
3. Whether Houser plausibly alleged personal involvement by the Commonwealth defendants in an unconstitutional denial of medical care.
4. Whether Houser plausibly alleged deliberate indifference to serious medical needs against the Commonwealth defendants, Dr. Letizio, and Physician Assistant Walsh.
5. Whether generalized allegations against all defendants and claims based on a denied beard-and-mustache trimmer stated an Eighth Amendment claim.

HOLDINGS

1. Claims based on events occurring before April 7, 2023 are barred by the applicable two-year statute of limitations, and Houser's claims in this action are confined to conduct occurring from April 7, 2023 through April 7, 2025.
2. Claims based on Grievance Nos. 1052304, 1073356, 1073357, 1108285, 1120928, 1108854, 1124605, 1126487, and 1148451 were unexhausted and procedurally defaulted, while claims based on Grievance Nos. 1055637, 1057518, 1115068, and 1109114 could proceed because the present record did not establish nonexhaustion.
3. A supervisory defendant cannot be held liable under 42 U.S.C. § 1983 solely on a respondeat superior theory; liability requires particularized allegations of personal direction or actual knowledge and acquiescence.
4. Houser plausibly alleged an Eighth Amendment denial-of-medical-care claim against Terra, Sipple, Hensley, and Huner, but only as limited to the specifically identified allegations in the amended and second amended complaints.
5. The pleaded claims against Dr. Letizio plausibly stated an Eighth Amendment denial-of-medical-care claim and could proceed, but Houser failed to plead a timely, plausible deliberate-indifference claim against Walsh, so all claims against Walsh were dismissed.

KEY QUOTATIONS

“Incarcerated persons must “exhaust administrative remedies even where relief sought—monetary damages—cannot be granted by the administrative process.”” (Section II.B)

“The Commonwealth Defendants may not be held liable under section 1983 based only on a respondeat superior theory of liability.” (Section II.C.1)

“The Eighth Amendment forbids state actors’ deliberate indifference to serious medical needs of incarcerated persons.” (Section II.C.2)

FACTUAL BACKGROUND

Houser, incarcerated at SCI-Phoenix, alleged that prison officials and medical personnel denied or inadequately addressed longstanding leg and knee injuries, including his alleged need for surgery, pain management, braces, a wheelchair, imaging, and orthopedic consultation. The claims relied on events occurring within and outside the applicable two-year limitations period, and Houser identified multiple prison grievances concerning the alleged medical-care deficiencies. The court found specific allegations of personal knowledge, refusal to act, or refusal to provide care sufficient to permit limited claims against certain officials and Dr. Letizio to proceed, but found the allegations against Physician Assistant Walsh insufficiently tied to the limitations period.

PROCEDURAL HISTORY

Houser filed his original complaint on April 7, 2025. The court dismissed the official-capacity claims under the Eleventh Amendment, claims accruing before April 7, 2023 as untimely, and claims lacking personal involvement or a plausible deliberate-indifference allegation, while granting leave to amend. After reviewing the amended and second amended complaints, the court dismissed claims based on nine unexhausted grievances, allowed claims based on four additional grievances to proceed pending discovery, allowed limited claims against Terra, Sipple, Hensley, and Huner, allowed the pleaded claims against Letizio to proceed, and dismissed all claims against Walsh.

DISPOSITION

other

CASES CITED

- Millbrook v. United States, 8 F. Supp. 3d 601, 611 (M.D. Pa. 2014)
- Oliver v. Wetzel, 861 F. App'x 509, 516 (3d Cir. 2021)
- Woodford v. Ngo, 548 U.S. 81, 84, 85, 90, 92-93 (2006)
- Perttu v. Richards, 605 U.S. 460, 469-70 (2025)
- Helms v. Superintendent Sorber, No. 24-6928, 2026 WL 358286, at *7 (E.D. Pa. Feb. 9, 2026)
- Rinaldi v. United States, 904 F.3d 257, 261 n.1 (3d Cir. 2018)
- Prater v. Dep't of Corr., 76 F.4th 184, 203-04 (3d Cir. 2023)
- Wright v. Fedder, No. 23-5099, 2025 WL 2825588, at *5-*7 (E.D. Pa. Oct. 3, 2025)

- Stanley v. Little, No. 23-4571, 2024 WL 3678987, at *5 (E.D. Pa. Aug. 6, 2024)
- Rasheed v. Saez, No. 20-154, 2022 WL 14068766, at *5 (M.D. Pa. Oct. 24, 2022)
- Spruill v. Gillis, 372 F.3d 218, 234 (3d Cir. 2004)
- Oriakhi v. United States, 165 F. App'x 991, 993 (3d Cir. 2006)
- Newton v. Garza, No. 25-907, 2025 WL 2045734, at *1 (M.D. Pa. July 21, 2025)
- Cabot v. Fed. Bureau of Prisons, No. 17-710, 2018 WL 4291747, at *5 (M.D. Pa. Sept. 7, 2018)
- Johnson v. Dep't of Corr., No. 14-896, 2016 WL 1135501, at *6 (M.D. Pa. Mar. 3, 2016)
- Dooley v. Wetzel, 957 F.3d 366, 374 (3d Cir. 2020)
- Rode v. Dellarciprete, 845 F.2d 1195, 1207 (3d Cir. 1988)
- Durham v. Kelley, 82 F.4th 217, 229 (3d Cir. 2023)

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