

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
LOUISIANA

Rajel Johnson v. Cassandra Matney, et al.

Johnson v. Matney · No. 2:24-cv-02510 · Decided December 10, 2025

SUMMARY

The United States District Court for the Eastern District of Louisiana considers Defendants Cassandra Matney and Barry Pittman’s motion to dismiss Rajel Johnson’s 42 U.S.C. § 1983 claims. Johnson alleged deliberate indifference to medical needs and unconstitutional conditions of confinement arising from a hand injury sustained while operating a prison deli slicer. The court concludes that the allegations do not satisfy the applicable standards for official-capacity claims, deliberate indifference, or unconstitutional conditions of confinement, and dismisses the claims addressed in the opinion.

CASE DETAILS

COURT	United States District Court for the Eastern District of Louisiana
WRITING FOR THE COURT	Michael B. North
JURISDICTION	United States District Court for the Eastern District of Louisiana
DECIDED	December 10, 2025
DOCKET	2:24-cv-02510
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendants moved to dismiss a pro se prisoner's 42 U.S.C. § 1983 complaint under Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6). The court considered the motion without opposition and dismissed the claims with prejudice.
STANDARD OF REVIEW	The court considered the Rule 12(b)(1) jurisdictional challenge first. For a Rule 12(b)(1) facial challenge, the plaintiff bears the burden of establishing subject-matter jurisdiction, and the court may consider the complaint, undisputed record evidence, and resolution of disputed facts. Under Rule 12(b)(6), the court accepted well-pleaded facts as true, viewed them favorably to the plaintiff, and required facts sufficient to state a plausible claim for relief.
PRECEDENTIAL VALUE	unpublished district court order; persuasive only
PARTIES	Rajel Johnson v. Cassandra Matney, Barry Pittman

TOPICS

motions to dismiss

section 1983

prisoners rights

cruel and unusual punishment

constitutional law

PRACTICE AREAS

civil rights

prisoner litigation

constitutional law

civil procedure

QUESTIONS PRESENTED

1. Whether Johnson's claims against Matney and Pittman in their official capacities were cognizable under 42 U.S.C. § 1983.
2. Whether Johnson plausibly alleged that Matney acted with deliberate indifference to his serious medical needs in violation of the Eighth Amendment.
3. Whether Johnson plausibly alleged that Pittman acted with deliberate indifference to unconstitutional conditions of confinement by assigning or permitting him to operate the deli slicer.
4. Whether Johnson stated a viable retaliation or injunctive-relief claim.
5. Whether Johnson should be granted leave to amend.

HOLDINGS

1. Claims for monetary or equitable relief against state officials in their official capacities fail because a state and its officials acting in their official capacities are not persons subject to suit under § 1983.
2. Johnson failed to state an Eighth Amendment deliberate-indifference claim because the allegations and record showed repeated medical evaluations, wound care, medication, monitoring, hospital treatment, and follow-up care, not a refusal to treat or wanton disregard of a serious medical need.
3. Johnson failed to state an Eighth Amendment conditions-of-confinement claim because he did not plausibly allege a sufficiently serious deprivation or that Pittman knew of and disregarded an excessive risk to his health or safety.
4. Johnson failed to state a retaliation claim or a claim for prospective injunctive relief because he alleged no retaliatory adverse act, causation, or ongoing constitutional violation.
5. Leave to amend was denied because Johnson had pleaded his best case and any amendment would be futile.

KEY QUOTATIONS

“We hold instead that a prison official cannot be found liable under the Eighth Amendment for denying an inmate humane conditions of confinement 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.” (at 12)

“Deliberate indifference is not established when ‘medical records indicate that the plaintiff was afforded extensive medical care by prison officials.’” (at 7)

“In short, Plaintiff’s allegations do not rise to the requisite level to show that Pittman acted with deliberate indifference to Plaintiff’s safety in violation of Plaintiff’s constitutional rights, nor has Plaintiff alleged a “sufficiently serious” deprivation.” (at 14)

FACTUAL BACKGROUND

Johnson injured his hand on December 15, 2023, while operating a deli slicer at Rayburn Correctional Center. Nurse Cassandra Matney treated him with a tetanus shot, Tylenol, gauze, wound care, and a seven-day no-work status; he was later sent to a hospital when bleeding increased. Johnson alleged that Matney failed to notify a supervisor and that Captain Barry Pittman assigned or supervised unsafe kitchen work involving a slicer allegedly missing a blade protector or finger guard. The grievance record showed that Johnson had received slicer-safety training and that his medical duty status did not prohibit kitchen work or equipment operation.

PROCEDURAL HISTORY

Johnson filed an administrative grievance concerning a hand injury sustained while operating a prison deli slicer. After the grievance was denied at both steps, he filed this § 1983 action on October 18, 2024, alleging deliberate indifference to medical needs and unconstitutional conditions of confinement against Nurse Cassandra Matney and Captain Barry Pittman. Defendants moved to dismiss, and Johnson filed no opposition. The court granted the motion and dismissed the action with prejudice, finding amendment futile.

DISPOSITION

dismissed

CASES CITED

- Stockman v. Federal Election Commission, 668 F.3d 281, 286-87 (5th Cir. 2012)
- In re FEMA Trailer Formaldehyde Products Liability Litigation, 713 F.3d 807, 813 (5th Cir. 2013)
- Will v. Michigan Department of State Police, 491 U.S. 58, 71 (1989)
- Fairley v. Stalder, 294 F. App'x 805, 808-09 (5th Cir. 2008)
- Wilson v. Seiter, 501 U.S. 294, 297 (1991)
- Estelle v. Gamble, 429 U.S. 97, 106 (1976)
- Farmer v. Brennan, 511 U.S. 825, 832, 834-37, 847 (1994)
- Gobert v. Caldwell, 463 F.3d 339, 346 (5th Cir. 2006)
- Brauner v. Coody, 793 F.3d 493, 500 (5th Cir. 2015)
- Herman v. Holiday, 238 F.3d 660, 664 (5th Cir. 2001)
- Hope v. Harris, 861 F. App'x 571, 582-83 (5th Cir. 2021)
- Hudson v. McMillian, 503 U.S. 1, 9 (1992)
- Jackson v. Cain, 864 F.2d 1235, 1245-46 (5th Cir. 1989)
- Mendoza v. Lynaugh, 989 F.2d 191, 194 (5th Cir. 1993)
- Bowie v. Procnier, 808 F.2d 1142, 1142 (5th Cir. 1987)

- *Osolinski v. Kane*, 92 F.3d 934, 936, 938-39 (9th Cir. 1996)
- *Ex parte Young*, 209 U.S. 123 (1908)
- *McDonald v. Stewart*, 132 F.3d 225, 231 (5th Cir. 1998)
- *Twombly*, 550 U.S. 544, 555-56 (2007)
- *Ashcroft v. Iqbal*, 556 U.S. 662 (2009)
- *Albers v. County of Contra Costa*, 848 F.3d 415, 423 (5th Cir. 2017)

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