

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF  
ILLINOIS, PEORIA DIVISION

William Eugene Drummond v. Chris Watkins et al.

Drummond · No. 25-1413 · Decided February 2, 2026

SUMMARY

This order screens William Eugene Drummond’s amended 42 U.S.C. § 1983 complaint concerning alleged inadequate medical care while detained at the Peoria County Jail. The court permits Fourteenth Amendment medical-care claims to proceed against nurses Cara and Kristen and unidentified doctors and nurses, while terminating the Sheriff, jail, and State of Illinois as defendants. The court also denies Plaintiff’s motions for counsel and addresses service and discovery procedures.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Central District of Illinois, Peoria Division                                                                                                                                                                                                                                                                                                                              |
| WRITING FOR THE COURT | Colleen R. Lawless                                                                                                                                                                                                                                                                                                                                                                                              |
| JURISDICTION          | United States District Court for the Central District of Illinois, Peoria Division                                                                                                                                                                                                                                                                                                                              |
| DECIDED               | February 2, 2026                                                                                                                                                                                                                                                                                                                                                                                                |
| DOCKET                | 25-1413                                                                                                                                                                                                                                                                                                                                                                                                         |
| DISPOSITION           | other                                                                                                                                                                                                                                                                                                                                                                                                           |
| PROCEDURAL POSTURE    | The district court screened a detainee's amended civil-rights complaint under 28 U.S.C. § 1915A, granted leave to file the amended complaint, denied a duplicative amendment motion and a motion for recruitment of counsel, and determined which claims and defendants could proceed.                                                                                                                          |
| STANDARD OF REVIEW    | Under 28 U.S.C. § 1915A, the court screens the complaint and dismisses claims that are frivolous, malicious, fail to state a claim, or seek monetary relief from an immune defendant. At screening, factual allegations are accepted as true and construed liberally in a pro se plaintiff's favor, but conclusory statements and labels are insufficient; the complaint must state a facially plausible claim. |
| PRECEDENTIAL VALUE    | nonprecedential                                                                                                                                                                                                                                                                                                                                                                                                 |

## TOPICS

section 1983

prisoners rights

fourteenth amendment

service of process

civil procedure

## PRACTICE AREAS

civil rights

civil procedure

prisoner medical care

constitutional law

## QUESTIONS PRESENTED

1. Whether the amended complaint stated a Fourteenth Amendment medical-care claim against Nurses Cara and Kristen and the Doe medical personnel.
2. Whether the complaint stated claims against Dr. Duran, Sheriff Chris Watkins, the Peoria County Jail, or the State of Illinois.
3. Whether service could proceed against unidentified Doe defendants and how those defendants should be identified.
4. Whether recruitment of counsel was warranted at the early screening and service stage.
5. Whether the later motion for leave to amend should be granted and the earlier duplicative motion denied.

## HOLDINGS

1. The complaint plausibly stated an individual-capacity Fourteenth Amendment medical-care claim against Nurses Cara and Kristen and the unidentified Doe doctors and nurses. The court also treated the allegations as sufficient to state an Eighth Amendment deliberate-indifference claim against Cara and Kristen, although the operative order characterized the proceeding claim as arising under the Fourteenth Amendment.
2. The complaint did not state a claim against Dr. Duran because it did not allege that he examined Plaintiff or personally informed Plaintiff that he would receive only Tylenol.
3. The complaint did not state a claim against Watkins because it alleged no facts establishing or permitting an inference that he violated Plaintiff's constitutional rights.
4. The complaint did not state a claim against the Peoria County Jail because a jail or correctional facility is not a suable entity under § 1983.
5. The complaint did not state a claim against the State of Illinois because the Eleventh Amendment immunizes an unconsenting state from suit in federal court and Illinois law generally bars making the State a defendant or party in court.
6. Service could not occur on Doe defendants before their identities were learned. After the named defendants were served and answered, the court would enter a scheduling order guiding discovery to identify the Doe defendants and requiring a timely motion to substitute their real identities.
7. The motion for recruitment of counsel was denied at the early stage because Plaintiff had no constitutional right to appointed counsel in the civil action and recruitment was not yet warranted given the case's early procedural posture.

8. The later motion for leave to file an amended complaint was granted, while the earlier motion was denied as duplicative.

#### KEY QUOTATIONS

*“To prevail on a claim alleging inadequate medical care, a pretrial detainee must prove three elements: (1) the medical condition is or was objectively serious; (2) the defendant acted purposefully, knowingly, or recklessly concerning the consequences of his actions; and (3) the defendant’s actions were objectively unreasonable—that is, not rationally related to a legitimate governmental objective.” (Analysis)*

*“According to the Court’s screening of Plaintiff’s Complaint [1] under 28 U.S.C. § 1915A, Plaintiff states a Fourteenth Amendment lack of medical care claim against Defendant nurse Cara and Kristen, and the Doe Doctors and Nurses.” (IT IS THEREFORE ORDERED ¶ 3)*

#### FACTUAL BACKGROUND

Plaintiff, a detainee at the Peoria County Jail, alleged that he reported a preexisting chipped knee bone and severe leg and knee pain after his arrest on August 20, 2025. He alleged that jail medical staff limited him to Tylenol, refused to administer prescription rheumatoid-arthritis medication delivered by his mother, and continued that course after Nurses Cara and Kristen told him that Dr. Duran would prescribe only Tylenol. The court construed these allegations as asserting inadequate medical care against the nurses and unidentified doctors and nurses.

#### PROCEDURAL HISTORY

Plaintiff filed motions for leave to amend his complaint and a motion for counsel. The court granted the later amendment motion, denied the earlier duplicative motion, screened the amended complaint, added Nurses Cara and Kristen as defendants, terminated Chris Watkins, the Peoria County Jail, and the State of Illinois, and allowed individual-capacity medical-care claims against Cara, Kristen, and unidentified Doe medical personnel to proceed to service.

#### DISPOSITION

other

#### CASES CITED

- Turley v. Rednour, 729 F.3d 645, 649 (7th Cir. 2013)
- Alexander v. United States, 721 F.3d 418, 422 (7th Cir. 2013)
- Hardeman v. Curran, 933 F.3d 816, 827 (7th Cir. 2019)
- Bell v. Blaesing, 844 F. App'x 924, 925 (7th Cir. 2021)
- Arnett v. Webster, 658 F.3d 742, 751 (7th Cir. 2011)
- Mitchell v. Kallas, 895 F.3d 492, 498 (7th Cir. 2018)
- Collins v. Kibort, 143 F.3d 331, 334 (7th Cir. 1998)
- Smith v. Knox Cty. Jail, 666 F.3d 1037, 1040 (7th Cir. 2012)

- *Murphy v. Smith*, 844 F.3d 653, 656 (7th Cir. 2016)
- *Benning v. Bd. of Regents of Regency Univs.*, 928 F.2d 775, 777 (7th Cir. 1991)
- *Jackson v. County of McLean*, 953 F.2d 1070, 1071 (7th Cir. 1992)
- *Pruitt v. Mote*, 503 F.3d 647, 654 (7th Cir. 2007)

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