

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
ALABAMA, NORTHERN DIVISION

Frederick Dwight Jones v. Rolanda Calloway

Jones v. Calloway · No. 2:23-CV-165-SMD · Decided February 3, 2026

SUMMARY

The United States District Court for the Middle District of Alabama grants Defendant Rolanda Calloway’s motion for summary judgment and denies Plaintiff Frederick Dwight Jones’s motion for judgment on the pleadings. The court holds that Jones failed to establish deliberate indifference or an affirmative causal connection between Calloway’s conduct and his alleged over-detention in violation of Fourteenth Amendment due process. The court enters judgment for Calloway and dismisses the case with prejudice.

CASE DETAILS

COURT	United States District Court for the Middle District of Alabama, Northern Division
JURISDICTION	United States District Court for the Middle District of Alabama, Northern Division
DECIDED	February 3, 2026
DOCKET	2:23-CV-165-SMD
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff, a state prisoner proceeding pro se under 42 U.S.C. § 1983, moved for judgment on the pleadings. Defendant moved for summary judgment on Plaintiff’s remaining Fourteenth Amendment over-detention claim. The court applied the Rule 56 summary-judgment standard, denied Plaintiff’s motion, granted Defendant’s motion, entered judgment for Defendant, and dismissed the case with prejudice.
STANDARD OF REVIEW	Under Federal Rule of Civil Procedure 56, summary judgment is appropriate when there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The court may not weigh evidence or make credibility determinations, must view evidence and draw justifiable inferences in favor of the nonmovant, and may treat properly unsupported factual assertions as undisputed under Rule 56(e).

TOPICS

section 1983

prisoners rights

procedural due process

sovereign immunity

summary judgment

PRACTICE AREAS

civil rights litigation

prisoner civil rights

constitutional law

federal civil procedure

QUESTIONS PRESENTED

1. Whether Calloway was entitled to sovereign immunity from monetary damages sought against her in her official capacity.
2. Whether Jones presented sufficient evidence to create a genuine dispute of material fact that Calloway acted with deliberate indifference to his Fourteenth Amendment due-process rights by causing his alleged over-detention.
3. Whether additional claims concerning events after Jones's release were properly before the court and cognizable under § 1983.

HOLDINGS

1. Calloway was entitled to sovereign immunity from monetary damages sought against her in her official capacity because an official-capacity suit is treated as a suit against the State, Alabama had not waived its Eleventh Amendment immunity in § 1983 actions, and Congress had not abrogated that immunity.
2. Jones failed to establish a genuine issue of material fact on his Fourteenth Amendment due-process over-detention claim because he did not show that Calloway acted with subjective recklessness or that her specific acts or omissions affirmatively caused the alleged over-detention.
3. Claims that Jones's filings might be construed to assert concerning events after his release, including the later revocation hearing and subsequent parole denials, were not properly before the court and were not cognizable under § 1983 pursuant to Heck v. Humphrey.

KEY QUOTATIONS

“Plaintiff’s Motion for Judgment on the Pleadings (Doc. 95) is DENIED, Defendant Calloway’s Motion for Summary Judgment (Doc. 104) is GRANTED, and this case is DISMISSED with prejudice.” (I)

“Because the evidence fails to establish either deliberate indifference by Defendant Calloway or that she affirmatively caused Plaintiff’s over-detention, Plaintiff has failed to establish a genuine issue of material fact on his Fourteenth Amendment due process claim.” (IV.b)

FACTUAL BACKGROUND

Jones, who had previously been paroled from an Alabama life sentence, was arrested in Indiana in March 2020 for an alleged parole violation and transported to Kilby Correctional Facility. He did not receive a parole-

revocation hearing within the 20-business-day period described in Ala. Code § 15-22-32(a), and he remained detained until his release on September 1, 2020, after an assistant field director instructed Warden Calloway to release him. Jones claimed that Calloway knew of the lack of a hearing and should have notified the Parole Board, but the record did not show that Calloway knew she had responsibility to notify the Board, knew Jones was entitled to release, or caused the continued detention. Jones's own sworn filings attributed the continued detention to the Parole Board's alleged knowledge and inaction.

PROCEDURAL HISTORY

Jones filed an amended § 1983 complaint asserting multiple claims against multiple defendants. All but one claim against Warden Rolanda Calloway were dismissed before this order. The remaining claim alleged that Calloway violated Jones's Fourteenth Amendment due-process rights by failing to ensure his release or notify the Alabama Board of Pardons and Paroles after he did not receive a timely parole-revocation hearing. The court denied Jones's motion for judgment on the pleadings, granted Calloway's motion for summary judgment, and dismissed the action with prejudice.

DISPOSITION

dismissed

CASES CITED

- *Dresdner Bank AG v. M/V Olympia Voyager*, 463 F.3d 1210, 1215 (11th Cir. 2006)
- *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 247–50 (1986)
- *Redwing Carriers, Inc. v. Saraland Apartments*, 94 F.3d 1489, 1496 (11th Cir. 1996)
- *Dean v. 1715 Northside Drive, Inc.*, 224 F. Supp. 3d 1302, 1308 n.1 (N.D. Ga. 2016)
- *Celotex Corp. v. Catrett*, 477 U.S. 317, 322–24 (1986)
- *Matsushita Elec. Indus. Co., Ltd. v. Zenith Radio Corp.*, 475 U.S. 574, 586 (1986)
- *Tipton v. Bergrohr GMBH-Siegen*, 965 F.2d 994, 998–99 (11th Cir. 1992)
- *Ellis v. England*, 432 F.3d 1321, 1326 (11th Cir. 2005)
- *Walker v. Darby*, 911 F.2d 1573, 1577 (11th Cir. 1990)
- *Cox v. Adm'r U.S. Steel & Carnegie*, 17 F.3d 1386, 1400 (11th Cir.), opinion modified on reh'g, 30 F.3d 1347 (11th Cir. 1994)
- *Kentucky v. Graham*, 473 U.S. 159, 166 (1985)
- *Pennhurst State Sch. & Hosp. v. Halderman*, 465 U.S. 89, 100 (1984)
- *Seminole Tribe of Fla. v. Florida*, 517 U.S. 44, 59 (1996)
- *Holmes v. Hale*, 701 F. App'x 751, 753 (11th Cir. 2017)
- *Carr v. City of Florence, Ala.*, 916 F.2d 1521, 1525 (11th Cir. 1990)
- *Selensky v. Alabama*, 619 F. App'x 846, 849 (11th Cir. 2015)
- *Harbert Int'l, Inc. v. James*, 157 F.3d 1271, 1277–78 (11th Cir. 1998)
- *Edwards v. Wallace Cmty. Coll.*, 49 F.3d 1517, 1524 (11th Cir. 1995)

- Will v. Michigan Dep't of State Police, 491 U.S. 58, 71 (1989)
- Alcocer v. Mills, 906 F.3d 944, 953 (11th Cir. 2018)
- Ellard v. Alabama Bd. of Pardons & Paroles, 824 F.2d 937, 943 (11th Cir. 1987)
- Wade v. McDade, 106 F.4th 1251, 1256, 1262 (11th Cir. 2024)
- Farmer v. Brennan, 511 U.S. 825, 836–37 (1994)
- Holt v. Glenn, 361 F. App'x 75, 77 (11th Cir. 2010) (per curiam)
- Zatler v. Wainwright, 802 F.2d 397, 401 (11th Cir. 1986)
- Monell v. Dep't of Soc. Servs. of City of New York, 436 U.S. 658, 691–95 (1978)
- Belcher v. City of Foley, Ala., 30 F.3d 1390, 1396 (11th Cir. 1994)
- Roy v. Ivy, 53 F.4th 1338, 1347 (11th Cir. 2022)
- Carr v. Tatangelo, 338 F.3d 1259, 1273 n.26 (11th Cir. 2003), as amended (Sept. 29, 2003)
- Heck v. Humphrey, 512 U.S. 477 (1994)

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