

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA, ERIE DIVISION

Harry Roland v. Wellpath, Dr. Mary Howick, Kim Smith, E. Snyder,
Bob Rumcik, and Brad Avenoti

Roland · No. 1:24-CV-00311-RAL · Decided June 11, 2026

SUMMARY

The United States District Court for the Western District of Pennsylvania grants Wellpath, Dr. Mary Howick, and E. Snyder’s motion to dismiss claims arising from alleged deliberate indifference to serious medical needs. The court concludes that Wellpath’s bankruptcy discharge bars the claims against Wellpath, LLC, and that the confirmed plan’s third-party release and injunction bar the claims against Howick and Snyder because Roland did not opt out. The defendants’ alternative request for judgment on the pleadings is denied as moot.

CASE DETAILS

COURT	United States District Court for the Western District of Pennsylvania, Erie Division
WRITING FOR THE COURT	Richard A. Lanzillo, Chief United States Magistrate Judge
JURISDICTION	United States District Court for the Western District of Pennsylvania, Erie Division
DECIDED	June 11, 2026
DOCKET	1:24-CV-00311-RAL
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff brought claims under the Eighth Amendment against Wellpath and several individuals. Wellpath, Dr. Howick, and PA Snyder moved to dismiss under Federal Rule of Civil Procedure 12(b)(6), or alternatively for judgment on the pleadings under Rule 12(c), based on Wellpath's Chapter 11 discharge and the bankruptcy plan's third-party release.
STANDARD OF REVIEW	The court considered dismissal under Federal Rule of Civil Procedure 12(b)(6) and, alternatively, judgment on the pleadings under Rule 12(c).
PRECEDENTIAL VALUE	Unknown; unpublished district court opinion

PARTIES

Harry Roland v. Wellpath, Dr. Mary Howick, Kim Smith, E. Snyder,
Bob Rumcik, Brad Avenoti

TOPICS

discharge

motions to dismiss

injunctions

bankruptcy

civil rights

PRACTICE AREAS

bankruptcy

civil rights

civil procedure

QUESTIONS PRESENTED

1. Whether Wellpath's Chapter 11 discharge barred Roland from continuing his claims against Wellpath, LLC.
2. Whether the bankruptcy plan's third-party release and injunction barred Roland's claims against Wellpath employees Dr. Howick and PA Snyder because he did not opt out.
3. Whether the defendants' alternative motion for judgment on the pleadings should be decided after dismissal under Rule 12(b)(6).

HOLDINGS

1. The Chapter 11 discharge and the injunction arising from it barred Roland from proceeding with claims against Wellpath, LLC for liabilities arising before November 11, 2024.
2. Because Roland did not timely opt out of the bankruptcy plan's third-party release, he did not preserve his claims against Wellpath employees Dr. Howick and PA Snyder, and those claims were subject to the plan's injunction and had to be dismissed.
3. The alternative request for judgment on the pleadings was denied as moot because the claims were dismissed under Rule 12(b)(6).

KEY QUOTATIONS

“A discharge of a Chapter 11 bankruptcy debtor “operates as an injunction against commencement or continuation of an action, the employment of process, or an act, to collect, recover or offset any such debt as a personal liability of the debtor, whether or not discharge of such debt is waived.”” (Discussion)

FACTUAL BACKGROUND

Roland, an inmate in Pennsylvania Department of Corrections custody, alleged that medical providers at SCI-Forest were deliberately indifferent to his serious medical needs in violation of the Eighth Amendment. Wellpath was a contractor providing medical services to DOC inmates, and Dr. Howick and PA Snyder were associated with Wellpath. Wellpath Holdings later entered Chapter 11 bankruptcy, and Roland did not opt out of the plan's third-party release.

PROCEDURAL HISTORY

Roland filed suit while incarcerated, alleging deliberate indifference to serious medical needs. Wellpath Holdings commenced Chapter 11 bankruptcy proceedings, resulting in an automatic stay that this court later lifted as to nondebtor defendants. After confirmation of the bankruptcy plan, the Wellpath Defendants moved to dismiss; Roland did not respond. The court granted the motion to dismiss all claims against Wellpath, Dr. Howick, and PA Snyder and denied the alternative Rule 12(c) motion as moot.

DISPOSITION

dismissed

CASES CITED

- In re Wellpath Holdings, Inc., No. 24-90533 (Bankr. S.D. Tex. Nov. 11, 2024)
- McDonald v. Jones, 427 Fed. Appx. 84, 85 (3d Cir. 2011)
- Sands v. McCormick, 502 F.3d 263, 268 (3d Cir. 2007)
- Perez-Martinez v. County of Union Penna, 2025 WL 2004700, at *6 (E.D. Pa. July 17, 2025)
- Lewis v. Kimberly L. Smith, 2026 WL 1335936 (W.D. Pa. Apr. 24, 2026)
- Williams v. The Geo Group, 2025 WL 2325649, at *9 n.11 (E.D. Pa. Aug. 11, 2025)

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