

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
ILLINOIS

Willie Williams v. Joshua A. Schoenbeck and Jason N. Hart

No. 22-cv-756-RJD · No. No. 22-cv-756-RJD · Decided March 30, 2026

SUMMARY

The court denied inmate Willie Williams’s motion to compel supplemental discovery responses in his 42 U.S.C. § 1983 due process action concerning prison disciplinary proceedings. The court overruled certain relevance and overbreadth objections but held that defendants were not required to produce documents outside their possession, custody, or control. The court also deferred ruling on an asserted law-enforcement investigatory privilege and required defendants to clarify whether responsive information was being withheld.

CASE DETAILS

COURT	United States District Court for the Southern District of Illinois
WRITING FOR THE COURT	Reona J. Daly
JURISDICTION	United States District Court for the Southern District of Illinois
DECIDED	March 30, 2026
DOCKET	No. 22-cv-756-RJD
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved to compel Defendants to supplement responses to requests for production and sought sanctions. The magistrate judge denied the motion to compel and sanctions, while directing Defendants to clarify whether they were withholding responsive information under the asserted law-enforcement-investigatory privilege.
STANDARD OF REVIEW	Discovery disputes and objections were evaluated under the Federal Rules of Civil Procedure and Federal Rules of Evidence. The court required the proponent of the law-enforcement-investigatory privilege to establish the privilege with specificity and applied a balancing approach to the asserted privilege.
PRECEDENTIAL VALUE	unpublished
PARTIES	Willie Williams v. Joshua A. Schoenbeck, Jason N. Hart

TOPICS

discovery dispute

privilege

prisoners rights

due process

civil procedure

PRACTICE AREAS

civil procedure

prisoner civil rights

constitutional law

discovery

QUESTIONS PRESENTED

1. Whether information concerning persons entering Williams's housing unit, maintenance records, and surveillance video was relevant and sufficiently limited to require further production.
2. Whether Defendants were required to obtain documents maintained by the Illinois Department of Corrections when those documents were not within Defendants' possession, custody, or control.
3. Whether Defendants were required to provide a sworn declaration confirming that their document-production responses were complete.
4. Whether Defendants established the law-enforcement-investigatory privilege as a basis for withholding additional Offender 360 information.
5. Whether Williams was entitled to sanctions under Federal Rule of Civil Procedure 37(a)(5)(B).

HOLDINGS

1. Information concerning persons entering Williams's housing unit, repairs to his cell door, and surveillance of the relevant areas was relevant because it could show that Williams was prevented from attending the disciplinary hearing, identify the officer involved, and bear on whether Defendants knew that his absence was not a refusal.
2. Defendants were not required to obtain or produce responsive documents maintained by the Illinois Department of Corrections when those materials were not within Defendants' possession, custody, or control.
3. Defendants were not required to submit a separate sworn declaration confirming the completeness of their responses to requests for production because counsel's signature on the responses certified their completeness and correctness under Rule 26(g).
4. The court could not resolve Defendants' assertion of the law-enforcement-investigatory privilege on the existing record because Defendants had not specified the information allegedly protected, demonstrated that the privilege applied, or confirmed whether responsive information was being withheld.
5. Defendants did not adequately establish a security objection to production of prison video footage because they asserted the objection only conclusorily; the court nevertheless denied the motion as to the video because Defendants represented that no responsive materials were being withheld and Rule 34 did not require production of materials outside their control.
6. Williams was not entitled to sanctions under Rule 37(a)(5)(B) because his motion to compel was denied.

KEY QUOTATIONS

“Under Rule 26(g) of the Federal Rules of Civil Procedure, by signing the response to a request for production of documents, the party certifies that the disclosure “is complete and correct as of the time it is made.”” (p. 4)

“The balancing of that need—the need of the litigant who is seeking privileged investigative materials—against the harm to the government if the privilege is lifted is a particularistic and judgmental task.” (p. 8)

“Because Plaintiff’s Motion to Compel is denied, Plaintiff is not entitled to sanctions.” (p. 9)

FACTUAL BACKGROUND

Williams, an Illinois Department of Corrections inmate, alleged that he was denied due process during prison disciplinary proceedings. He claimed that a jammed cell door prevented him from attending a July 30, 2020 disciplinary hearing and that officials thereafter treated his absence as a refusal to attend. In discovery, he sought prison entry logs, maintenance records, surveillance video, and information concerning alleged gang affiliations in the Offender 360 system to support his claims regarding the hearing and allegedly fabricated evidence.

PROCEDURAL HISTORY

Williams brought a 42 U.S.C. § 1983 action concerning prison disciplinary proceedings and proceeded on a Fourteenth Amendment due process claim against Schoenbeck and Hart. After Defendants responded to Williams's requests for production, Williams moved to compel further responses to Requests 1-5 and 8 and sought sanctions. The court overruled certain relevance and overbreadth objections, but denied the motion because Defendants represented that they were not withholding responsive materials within their possession, custody, or control; as to Request 8, the court denied relief without prejudice to further consideration after Defendants clarified any withholding and, if necessary, sought a protective order.

DISPOSITION

other

CASES CITED

- Morfin v. City of East Chicago, 349 F.3d 989, 1001 (7th Cir. 2003)
- Marion v. Radtke, No. 07-CV-243-BBC, 2010 WL 2429724, at *9 (W.D. Wis. June 11, 2010), aff'd, 641 F.3d 874 (7th Cir. 2011)
- Robinson v. Moskus, 491 F. Supp. 3d 359, 366 (C.D. Ill. 2020)
- Armour v. Santos, No. 19-cv-678, 2022 WL 16572006, at *3 (S.D. Ill. Nov. 1, 2022)
- Jones v. Cross, 637 F.3d 841, 848-49 (7th Cir. 2011)
- Peate v. McCann, 294 F.3d 879, 885 (7th Cir. 2002)
- Dellwood Farms, Inc. v. Cargill, Inc., 128 F.3d 1122, 1125 (7th Cir. 1997)
- Black v. Sheraton Corp., 564 F.2d 531, 545-47 (D.C. Cir. 1977)
- Palmer v. City of Decatur, No. 17-3268, 2019 WL 13155813, at *12-*13 (C.D. Ill. Jan. 29, 2019), aff'd, No. 17-CV-3268, 2019 WL 13156163 (C.D. Ill. July 22, 2019)

- Lewis v. City of Chicago, 2004 WL 2608302, at *2 (N.D. Ill. Nov. 16, 2004)
- Hernandez v. Longini, 1997 WL 754041, at *3 (N.D. Ill. Nov. 13, 1997)

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