

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA

Kenneth Allen Washington v. Calvaral, Vangody

Washington v. Calvaral · No. 3:25-CV-516-GSL-AZ · Decided December 10, 2025

SUMMARY

The United States District Court for the Northern District of Indiana screened Kenneth Allen Washington’s amended prisoner complaint under 28 U.S.C. § 1915A. The court found that the complaint did not plausibly state claims concerning medical care or excessive force, but granted leave to file a second amended complaint clarifying the dates, locations, factual allegations, and alleged injuries. The court also denied motions for a docket sheet and cautioned that false statements under penalty of perjury could result in sanctions.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana
WRITING FOR THE COURT	Gretchen S. Lund
JURISDICTION	United States District Court for the Northern District of Indiana
DECIDED	December 10, 2025
DOCKET	3:25-CV-516-GSL-AZ
DISPOSITION	other
PROCEDURAL POSTURE	Screening of a prisoner's amended civil-rights complaint under 28 U.S.C. § 1915A.
STANDARD OF REVIEW	The court screened the amended complaint under 28 U.S.C. § 1915A and applied the Rule 8 plausibility standard, construing the pro se allegations liberally while accepting well-pleaded factual allegations as true.
PRECEDENTIAL VALUE	Unpublished district court opinion; limited persuasive value.
PARTIES	Kenneth Allen Washington v. Calvaral, Vangody

TOPICS

- section 1983
- prisoners rights
- fourteenth amendment
- pleadings
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the amended complaint plausibly alleged a Fourteenth Amendment claim for constitutionally inadequate medical care.
2. Whether the amended complaint plausibly alleged a Fourteenth Amendment excessive-force claim against the deputies.
3. Whether Washington should be granted leave to file a second amended complaint to clarify the dates, locations, factual allegations, and identities of the persons involved.
4. Whether Washington's motions for a docket sheet should be denied as unnecessary.

HOLDINGS

1. The amended complaint did not state a plausible inadequate-medical-care claim because the alleged stomach pain, two episodes of vomiting, weakness, fatigue, and generalized illness did not establish an objectively serious medical need, and the allegations did not show constitutionally unreasonable treatment.
2. The amended complaint did not state a plausible Fourteenth Amendment excessive-force claim because it did not adequately describe the circumstances leading to the force, the force used, Washington's response, the resulting injuries, or the subsequent medical care.
3. Washington was granted leave to file a second amended complaint because the deficiencies might be curable through clarification and amendment at the early pleading stage.

KEY QUOTATIONS

“To proceed beyond the pleading stage, a complaint must contain sufficient factual matter to “state a claim to relief that is plausible on its face.”” (Opinion at 1)

“At best, these allegations depict mild, transitory food poisoning or the ordinary stomach flu—either way, they don’t constitute a serious medical need under the Fourteenth Amendment, so Washington hasn’t stated a plausible claim related to them.” (Opinion at 5)

“A pretrial detainee states a valid Fourteenth Amendment excessive force claim by alleging: (1) the defendant “intended to commit the physical act that caused the alleged injury” and (2) the use of force was objectively unreasonable.” (Opinion at 6)

“This amended complaint does not state a claim for which relief can be granted.” (Opinion at 7)

FACTUAL BACKGROUND

Washington, a pretrial detainee housed in a county jail at the time of the alleged events, claimed that he became ill after eating dinner and vomited twice. He alleged that deputies refused a nurse's request to take him to medical, returned him to his cell, and then aggressively pulled, grabbed, and choked him back into the cell, causing neck and shoulder pain. The court found the allegations regarding his illness, injuries, the officers'

conduct, the timing and location of the events, and his subsequent medical care too vague or inconsistent to support plausible claims.

PROCEDURAL HISTORY

Washington filed an amended complaint alleging inadequate medical care and excessive force against jail deputies. The court determined that the amended complaint did not state a plausible claim, but granted Washington leave to file a second amended complaint by January 12, 2026, and denied his motions for a docket sheet as unnecessary.

DISPOSITION

other

CASES CITED

- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555, 570 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Edwards v. Snyder, 478 F.3d 827, 830 (7th Cir. 2007)
- McCready v. Ebay, Inc., 453 F.3d 882, 888 (7th Cir. 2006)
- Cancer Foundation, Inc. v. Cerberus Capital Management, LP, 559 F.3d 671, 674 (7th Cir. 2009)
- Miranda v. County of Lake, 900 F.3d 335 (7th Cir. 2018)
- Pittman v. Madison County, 108 F.4th 561, 570, 572 (7th Cir. 2024)
- Wynn v. Southward, 251 F.3d 588, 593 (7th Cir. 2001)
- Wheeler v. Walker, 303 F. App'x 365, 368 (7th Cir. 2008)
- Kingsley v. Hendrickson, 576 U.S. 389, 395-98 (2015)
- Mays v. Emanuele, 853 F. App'x 25, 27 (7th Cir. 2021)
- Mays v. Dart, 974 F.3d 810, 819 (7th Cir. 2020)
- Husnik v. Engles, 495 F. App'x 719, 721 (7th Cir. 2012)
- Bell v. Wolfish, 441 U.S. 520, 537 (1979)
- Graham v. Connor, 490 U.S. 386, 396 (1989)
- Jones v. Walker, 358 F. App'x 708, 713 (7th Cir. 2009)
- Swanson v. Citibank, N.A., 614 F.3d 400, 403 (7th Cir. 2010)
- Abu-Shawish v. United States, 898 F.3d 726, 738 (7th Cir. 2018)
- Washington v. Rayl, cause no. 3:20-CV-461-DRL-MGG (N.D. Ind. June 8, 2020)