

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

Jeremy Hall v. Jilian Crane, et al.

Hall · No. 1:25-cv-01528-JEH · Decided March 16, 2026

SUMMARY

The United States District Court for the Central District of Illinois conducted a merit review under 28 U.S.C. § 1915A of Jeremy Hall’s pro se § 1983 complaint concerning medical treatment at Menard and Pontiac Correctional Centers. The court held that Hall stated an Eighth Amendment deliberate-indifference claim against Jilian Crane and Dr. Alfred relating to an alleged liver and kidney infection and pain, and directed that the case proceed to service.

CASE DETAILS

COURT	United States District Court for the Central District of Illinois, Peoria Division
WRITING FOR THE COURT	Jonathan E. Hawley
JURISDICTION	United States District Court for the Central District of Illinois, Peoria Division
DECIDED	March 16, 2026
DOCKET	1:25-cv-01528-JEH
DISPOSITION	other
PROCEDURAL POSTURE	Pro se prisoner brought a 42 U.S.C. § 1983 action alleging Eighth Amendment deliberate-indifference claims arising from the failure to treat a liver and kidney infection and continuing pain. The district court conducted a preliminary merit review under 28 U.S.C. § 1915A.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915A, the court accepted factual allegations as true and liberally construed them in the plaintiff’s favor, while requiring enough nonconclusory facts to state a claim that is plausible on its face.
PRECEDENTIAL VALUE	Unpublished district court merit-review order; precedential status is not stated in the document.

TOPICS

- section 1983
- prisoners rights
- cruel and unusual punishment
- pleadings
- civil procedure

PRACTICE AREAS

civil rights

constitutional law

prisoner medical care

civil procedure

QUESTIONS PRESENTED

1. Whether Plaintiff's allegations that Defendants knew of and failed to treat his liver and kidney infection and continuing pain sufficiently stated an Eighth Amendment deliberate-indifference claim under 42 U.S.C. § 1983 at the 28 U.S.C. § 1915A merit-review stage.
2. Whether the case should proceed beyond merit review and be limited to the deliberate-indifference claim identified in the order.

HOLDINGS

1. Plaintiff alleged sufficient facts to proceed against Jilian Crane and Dr. Alfred on an Eighth Amendment claim based on alleged deliberate indifference to his liver and kidney infection and pain.
2. The case may proceed only on the Eighth Amendment deliberate-indifference claim against Crane and Dr. Alfred concerning the infection and pain, unless additional claims are permitted by the court for good cause under Federal Rule of Civil Procedure 15.

KEY QUOTATIONS

"Enough facts must be provided to "state a claim for relief that is plausible on its face."" (Section I)

"The official must know of and disregard an excessive risk to the inmate's health" (Section III)

"Plaintiff's allegations are sufficient to proceed on an Eighth Amendment claim against Defendants Crane and Dr. Alfred based on their alleged deliberate indifference to his liver and kidney infection and pain."
(Section III)

FACTUAL BACKGROUND

Plaintiff alleged that he was stabbed in the liver and kidney at Menard Correctional Center on February 26, 2024, and was treated at a hospital, where a physician informed him that he had a liver and kidney infection. He alleged that nurse practitioner Jilian Crane at Menard knew of the infection but did not provide medication for the infection or pain despite several requests. After Plaintiff transferred to Pontiac Correctional Center, he alleged that Dr. Alfred likewise failed to provide treatment despite being informed of the infection and pain, and that Plaintiff continued to experience constant, excruciating pain.

PROCEDURAL HISTORY

Plaintiff filed a complaint against a nurse practitioner and physician concerning alleged failures to provide medical treatment at Menard and Pontiac Correctional Centers. On merit review, the court accepted the factual allegations as true and liberally construed them in Plaintiff's favor. The court found that the allegations were sufficient to proceed against both defendants on the identified Eighth Amendment claim, limited the case to that claim, and directed service and subsequent case-management procedures.

DISPOSITION

other

CASES CITED

- Turley v. Rednour, 729 F.3d 645, 649-51 (7th Cir. 2013)
- Alexander v. United States, 721 F.3d 418, 422 (7th Cir. 2013)
- Wilson v. Ryker, 451 F. App'x 588, 589 (7th Cir. 2011)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Hayes v. Snyder, 546 F.3d 516, 522 (7th Cir. 2008)
- Farmer v. Brennan, 511 U.S. 825, 834, 837 (1994)
- Holloway v. Delaware Cnty. Sheriff, 700 F.3d 1063, 1073 (7th Cir. 2012)

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