

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
WISCONSIN

Remo Harrison Daniels v. Natalie Parsons

No. 25-cv-901-pp, United States District Court for the Eastern District of Wisconsin (January 14, 2026)

SUMMARY

The United States District Court for the Eastern District of Wisconsin denied Remo Harrison Daniels’s motion for a preliminary injunction in his 42 U.S.C. § 1983 action against Natalie Parsons. The court concluded that Daniels had not shown that the Wisconsin Department of Corrections maintained a policy of ignoring incarcerated individuals who threatened or engaged in self-harm, and that the record showed he received medical treatment for self-harm incidents.

CASE DETAILS

COURT	United States District Court for the Eastern District of Wisconsin
JURISDICTION	United States District Court for the Eastern District of Wisconsin
DECIDED	January 14, 2026
DOCKET	25-cv-901-pp
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff brought a 42 U.S.C. § 1983 action alleging deliberate indifference to threats of self-harm. After screening allowed an Eighth Amendment claim to proceed, plaintiff moved for a preliminary injunction requiring Wisconsin Department of Corrections staff not to walk away when he threatened or engaged in self-harm.
STANDARD OF REVIEW	A preliminary injunction requires a showing of some likelihood of success on the merits, inadequacy of traditional legal remedies, and likely irreparable harm absent relief, followed by a sliding-scale balance-of-harms analysis. Because plaintiff is incarcerated, the Prison Litigation Reform Act also requires that any preliminary relief be narrowly drawn, extend no further than necessary, and use the least intrusive means necessary.
PRECEDENTIAL VALUE	unpublished district court order

TOPICS

- injunctions
- prisoners rights
- section 1983
- civil rights
- cruel and unusual punishment

PRACTICE AREAS

civil procedure

prisoner civil rights

constitutional law

injunctive relief

QUESTIONS PRESENTED

1. Whether plaintiff was entitled to a preliminary injunction requiring DOC staff not to walk away when he threatened or engaged in self-harm.
2. Whether the Prison Litigation Reform Act limited the scope of the requested preliminary injunction.

HOLDINGS

1. Plaintiff was not entitled to a preliminary injunction because he failed to establish that the DOC had a policy of ignoring him when he threatened or engaged in self-harm and therefore did not demonstrate entitlement to preliminary injunctive relief.
2. Any preliminary injunction concerning prison conditions would have to comply with the PLRA's requirements that it be narrowly drawn, no broader than necessary to correct the identified harm, and the least intrusive means necessary.

KEY QUOTATIONS

“injunctive relief as an extraordinary remedy that may only be awarded upon a clear showing that the plaintiff is entitled to such relief.” (555 U.S. at 22)

“must be narrowly drawn, extend no further than necessary to correct the harm the court finds requires preliminary relief, and be the least intrusive means necessary to correct that harm.” (18 U.S.C. § 3626(a)(2))

FACTUAL BACKGROUND

Plaintiff, incarcerated at Columbia Correctional Institution, alleged that prison officials ignored threats that he would harm himself and asserted that the DOC maintained a policy of walking away from incarcerated people who self-harm or threaten self-harm. Records submitted by defendant showed that plaintiff received treatment for self-inflicted wounds and that staff responded when he began self-harming on June 14, 2025. The court found that plaintiff had not established a DOC-wide policy of ignoring self-harm and that his documented injuries had not been extensive.

PROCEDURAL HISTORY

The court screened the complaint and permitted plaintiff to proceed against Natalie Parsons on an Eighth Amendment claim arising from an alleged failure to respond to self-harm threats on April 17, 2025. Plaintiff then moved for a preliminary injunction based on additional alleged incidents. Defendant opposed the motion, and the court denied it after concluding that plaintiff had not shown the alleged DOC policy or otherwise established entitlement to preliminary relief.

DISPOSITION

other

CASES CITED

- Winter v. Natural Resources Defense Council, Inc., 555 U.S. 7, 22 (2008)
- Mazurek v. Armstrong, 520 U.S. 968, 972 (1997)
- Mays v. Dart, 974 F.3d 810, 818 (7th Cir. 2020)
- Courthouse News Service v. Brown, 908 F.3d 1063, 1068 (7th Cir. 2018)
- Ty, Inc. v. Jones Group, Inc., 237 F.3d 891, 895 (7th Cir. 2001)
- Westefer v. Neal, 682 F.3d 679, 683 (7th Cir. 2012)

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