

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

Phillip Anglin v. Lisa Draper et al.

No. 1:24-cv-01424-JEH, United States District Court for the Central District of Illinois, Peoria Division
(December 10, 2025)

SUMMARY

The court denied Defendant Zia Samad’s motion for summary judgment in a Fourteenth Amendment medical-care claim brought by pretrial detainee Phillip Anglin. The court held that Samad had not shown expert testimony was required and granted Anglin’s motions for an extension of time and for issuance of a subpoena concerning jail video footage.

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	December 10, 2025
DOCKET	1:24-cv-01424-JEH
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff brought a Fourteenth Amendment due process claim under 42 U.S.C. § 1983 concerning inadequate medical care while he was a pretrial detainee. Defendant Zia Samad moved for summary judgment, arguing that Plaintiff's claim was medical malpractice under Illinois law and required expert testimony. Plaintiff also moved for an extension of time to respond to discovery and for issuance of a subpoena.
STANDARD OF REVIEW	Summary judgment is proper when the movant shows that no genuine dispute of material fact exists and that the movant is entitled to judgment as a matter of law. The evidence and reasonable inferences must be construed in favor of the nonmoving party.
PRECEDENTIAL VALUE	unpublished district court opinion

PARTIES

Phillip Anglin v. Lisa Draper, Zia Samad, Baker

TOPICS

summary judgment

prisoners rights

due process

section 1983

discovery dispute

PRACTICE AREAS

civil procedure

civil rights

constitutional law

prisoner litigation

health law

QUESTIONS PRESENTED

1. Whether Defendant Samad was entitled to summary judgment because Plaintiff had not disclosed expert testimony required to establish an Illinois medical malpractice claim.
2. Whether the expert-testimony requirement applicable to certain medical malpractice claims governed Plaintiff's Fourteenth Amendment due process claim concerning inadequate medical care as a pretrial detainee.
3. Whether Plaintiff should receive additional time to respond to discovery requests.
4. Whether Plaintiff was entitled to issuance of a subpoena duces tecum for jail video footage relevant to an excessive-force claim.

HOLDINGS

1. Summary judgment was denied because Samad did not establish that expert testimony was required as a matter of law to resolve Plaintiff's Fourteenth Amendment inadequate-medical-care claim.
2. Plaintiff's claim was not treated as an Illinois medical malpractice claim for purposes of the motion because the Court's prior screening order limited it to a Fourteenth Amendment due process claim.

KEY QUOTATIONS

"At the second step, . . . [courts] ask whether the challenged conduct was objectively reasonable." (II.B)

"Defendant Samad's Motion for Summary Judgment (Doc. 38) is DENIED." (IV)

FACTUAL BACKGROUND

Plaintiff suffered a compound fracture to his lower right leg in September 2022 before entering the Livingston County Jail in November 2022. He alleged that he repeatedly sought medical care while at the Jail and that the passage of time without treatment allowed symptoms of his serious condition to worsen. The Court had previously determined that these allegations were sufficient to state a Fourteenth Amendment due process claim against Defendant Samad.

PROCEDURAL HISTORY

After screening Plaintiff's amended pleading, the Court allowed an individual-capacity Fourteenth Amendment due process claim against Samad based on alleged delays in treating Plaintiff's serious leg injury. Samad moved

for summary judgment. The Court denied that motion, granted Plaintiff's unopposed motion for an extension of time, and granted his motion for a subpoena duces tecum.

DISPOSITION

other

CASES CITED

- Zaya v. Sood, 836 F.3d 800, 804 (7th Cir. 2016)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248, 252 (1986)
- Celotex Corp. v. Catrett, 477 U.S. 317, 323-24 (1986)
- Spierer v. Rossman, 798 F.3d 502, 507 (7th Cir. 2015)
- Melton v. Tippecanoe County, 838 F.3d 814, 818 (7th Cir. 2016)
- Ogden v. Atterholt, 606 F.3d 355, 358 (7th Cir. 2010)
- Vargas v. United States, 430 F. Supp. 3d 500, 510 (N.D. Ill. 2019)
- Massey v. United States, 312 F.3d 272, 280 (7th Cir. 2002)
- Donais v. United States, 232 F.3d 595, 598 (7th Cir. 2000)
- Burton v. Downey, 805 F.3d 776, 784 (7th Cir. 2015)
- Bell v. Wolfish, 441 U.S. 520, 535 (1979)
- Miranda v. County of Lake, 900 F.3d 335, 353 (7th Cir. 2018)
- McCann v. Ogle County, 909 F.3d 881, 886 (7th Cir. 2018)
- Pittman by and through Hamilton v. Madison County, Illinois, 108 F.4th 561, 570 (7th Cir. 2024)
- Hathaway v. Coughlin, 37 F.3d 63, 68 (2d Cir. 1994)
- Burgos v. City of Philadelphia, 439 F. Supp. 3d 470, 490 (E.D. Pa. 2020)
- Pearson v. Prison Health Service, 850 F.3d 526, 536 (3d Cir. 2017)
- Brightwell v. Lehman, 637 F.3d 187, 194 (3d Cir. 2011)
- Ott v. City of Milwaukee, 682 F.3d 552, 557 (7th Cir. 2012)