

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
TENNESSEE

Patrick Ryan Smith v. Sevier County, Patrick McCormick, Michael
Hodges, and Quality Correctional Healthcare, Inc.

No. 3:24-CV-169-KAC-JEM · No. No. 3:24-CV-169-KAC-JEM · Decided March 9, 2026

SUMMARY

The United States District Court for the Eastern District of Tennessee screened Patrick Ryan Smith’s third amended complaint under the Prison Litigation Reform Act. The court allowed claims to proceed against Sevier County and Quality Correctional Healthcare, Inc. concerning allegedly inadequate medical care and against Patrick McCormick individually for deliberate indifference to medical needs. The court dismissed Sheriff Michael Hodges, McCormick in his official capacity, the outdoor-recreation claim, and all other intended claims.

CASE DETAILS

COURT	United States District Court for the Eastern District of Tennessee
WRITING FOR THE COURT	Katherine A. Crytzer
JURISDICTION	United States District Court for the Eastern District of Tennessee
DECIDED	March 9, 2026
DOCKET	No. 3:24-CV-169-KAC-JEM
DISPOSITION	other
PROCEDURAL POSTURE	Sua sponte screening of a pro se prisoner's third amended complaint under the Prison Litigation Reform Act.
STANDARD OF REVIEW	Under 28 U.S.C. §§ 1915(e)(2)(B) and 1915A, the court must dismiss sua sponte claims that are frivolous or malicious, fail to state a claim for relief, or seek relief from an immune defendant. The court applied the Rule 12(b)(6) plausibility standard and liberally construed the pro se complaint.
PRECEDENTIAL VALUE	Unknown; district-court memorandum and order with no reporter citation.
PARTIES	Patrick Ryan Smith v. Sevier County, Patrick McCormick, Michael Hodges, Quality Correctional Healthcare, Inc.

TOPICS

section 1983 prisoners rights civil procedure due process remedies

PRACTICE AREAS

civil rights prisoner litigation constitutional law medical care

QUESTIONS PRESENTED

1. Whether the third amended complaint plausibly stated claims under 42 U.S.C. § 1983 based on alleged denial of medical care caused by policies of Sevier County and Quality Correctional Healthcare, Inc.
2. Whether the complaint plausibly alleged that Patrick McCormick was personally deliberately indifferent to Plaintiff's medical needs.
3. Whether the complaint stated a claim against Sheriff Michael Hodges based on his supervisory position and the conclusory allegation that he sent Plaintiff to Jefferson County as punishment.
4. Whether claims against McCormick in his official capacity were redundant of claims against Quality Correctional Healthcare, Inc.
5. Whether the allegation of inadequate outdoor recreation stated a constitutional claim.
6. Whether the remaining allegations stated claims against a named defendant under § 1983.

HOLDINGS

1. A prisoner's complaint survives screening only when it contains sufficient factual matter, accepted as true, to state a plausible claim for relief; conclusory or speculative allegations are insufficient, although a pro se pleading must be liberally construed.
2. The complaint failed to state a § 1983 claim against Sheriff Hodges individually because it alleged no facts showing his personal involvement in a constitutional deprivation and did not plausibly support the conclusory assertion that he ordered Plaintiff's transfer as punishment.
3. The official-capacity claims against Sheriff Hodges were redundant and unnecessary because they were claims against Sevier County, the Sheriff's employer, and were duplicative of the claims already asserted against the County.
4. The complaint plausibly stated § 1983 claims that Plaintiff was denied adequate medical care, including testosterone therapy, proper suboxone dosing, and mental-health treatment, because of policies of Sevier County and QCHC, and that McCormick was personally liable for inadequate care in his individual capacity.
5. The claims against McCormick in his official capacity were dismissed as redundant because they were claims against his employer, QCHC.
6. The generalized allegation that Plaintiff had not received outdoor recreation for approximately one year did not plausibly state a constitutional violation and was dismissed.
7. The remaining allegations did not state § 1983 claims because they did not plausibly identify a constitutional violation by a named defendant.

KEY QUOTATIONS

“The operative complaint includes no facts that would allow the Court to infer that Plaintiff was transferred as punishment or even that Defendant Sheriff Hodges was the one who made the decision to transfer Plaintiff.” (at 5)

“So, these claims against Defendants Sevier County, QCHC, and Defendant McCormick, in his individual capacity, MAY PROCEED past initial screening.” (at 6)

“Without a minimum amount of outdoor time required, courts routinely dismiss claims arising out of a general assertion of insufficient outdoor time.” (at 7)

FACTUAL BACKGROUND

Plaintiff alleged that, while confined at the Sevier County Jail, he was denied testosterone therapy and mental-health treatment and received improper suboxone dosing pursuant to policies or customs of Sevier County and Quality Correctional Healthcare, Inc. He alleged that Patrick McCormick personally knew of his medical needs but delayed or denied treatment. Plaintiff also alleged that Sheriff Michael Hodges sent him to Jefferson County Jail as punishment, where he experienced medication interruptions, segregation, and a lack of disciplinary due process, and that he received insufficient outdoor recreation.

PROCEDURAL HISTORY

Plaintiff, a Sevier County Jail inmate proceeding pro se, filed a third amended complaint asserting claims under 42 U.S.C. § 1983 concerning medical care, prison policies, retaliation, recreation, and due process. The district court screened the complaint and allowed only specified medical-care claims to proceed against Sevier County, Quality Correctional Healthcare, Inc., and Patrick McCormick in his individual capacity. The court dismissed Sheriff Michael Hodges, McCormick in his official capacity, and all other intended claims, while directing service of process on the remaining defendants.

DISPOSITION

other

CASES CITED

- *Benson v. O'Brian*, 179 F.3d 1014 (6th Cir. 1999)
- *Ashcroft v. Iqbal*, 556 U.S. 662 (2009)
- *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544 (2007)
- *Hill v. Lappin*, 630 F.3d 468, 470-71 (6th Cir. 2010)
- *Haines v. Kerner*, 404 U.S. 519, 520 (1972)
- *Frazier v. Michigan*, 41 F. App'x 762, 764 (6th Cir. 2002)
- *Kentucky v. Graham*, 473 U.S. 159, 166 (1985)
- *Patterson v. Mintzes*, 717 F.2d 284, 289 (6th Cir. 1983)
- *Rodgers v. Jabe*, 43 F.3d 1082, 1086-88 (6th Cir. 1995)

- *Argue v. Hofmeyer*, 80 F. App'x 427, 430 (6th Cir. 2003)
- *Jeffries v. Williamson County Jail*, No. 3:18-CV-00228, 2018 WL 4778197, at *4-*5 (M.D. Tenn. Oct. 2, 2018)

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