

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK

Eric M. Hawkins v. Sandra Amoia, Deputy Superintendent of Erie County Correctional Health; John Garcia, Erie County Sheriff; John Doe, Physician Assistant at Erie County Holding Center; Jane Doe #1, Nurse Practitioner at Erie County Correctional Facility; Jane Doe #2, Nurse Practitioner at Erie County Correctional Facility; and Lieutenant Groves

Hawkins · No. 25-CV-6300-FPG · Decided March 10, 2026

SUMMARY

The United States District Court for the Western District of New York screened Eric M. Hawkins's amended 42 U.S.C. § 1983 complaint. The court allowed Fourteenth Amendment deliberate-indifference claims against a John Doe physician assistant and Jane Doe #1 nurse practitioner, and a First Amendment access-to-courts claim against Lieutenant Groves concerning missed court appearances, to proceed to service. The court dismissed the remaining claims, terminated several defendants, denied further leave to amend, and issued procedures under *Valentin v. Dinkins* to identify the Doe defendants.

CASE DETAILS

COURT	United States District Court for the Western District of New York
WRITING FOR THE COURT	Frank P. Geraci, Jr.
JURISDICTION	United States District Court for the Western District of New York
DECIDED	March 10, 2026
DOCKET	25-CV-6300-FPG
DISPOSITION	other
PROCEDURAL POSTURE	Screening of a pro se prisoner's amended complaint under 28 U.S.C. §§ 1915(e)(2)(B) and 1915A(b).
STANDARD OF REVIEW	The court screened the amended complaint under 28 U.S.C. §§ 1915(e)(2)(B) and 1915A(b), accepting well-pleaded allegations as true and determining whether they plausibly stated claims or sought relief from immune defendants.

PRECEDENTIAL VALUE	Unpublished district-court screening order; limited persuasive value.
PARTIES	Eric M. Hawkins v. Sandra Amoia, John Garcia, John Doe, Physician Assistant at Erie County Holding Center, Jane Doe #1, Nurse Practitioner at Erie County Correctional Facility, Jane Doe #2, Nurse Practitioner at Erie County Correctional Facility, Lieutenant Groves

TOPICS

section 1983

prisoners rights

first amendment

fourteenth amendment

civil procedure

PRACTICE AREAS

civil rights litigation

prisoner litigation

constitutional law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the amended complaint plausibly alleged Fourteenth Amendment deliberate-indifference claims against the John Doe physician assistant and Jane Doe #1 nurse practitioner.
2. Whether Plaintiff plausibly alleged municipal or supervisory liability against Amoia and Garcia based on official-capacity claims and respondeat superior.
3. Whether Plaintiff plausibly alleged a First Amendment denial-of-access-to-courts claim based on missed matrimonial-court appearances.
4. Whether Plaintiff stated an access-to-courts claim based on the alleged seizure of legal and medical documents.
5. Whether Plaintiff should receive a second opportunity to amend.

HOLDINGS

1. The amended complaint plausibly alleged that the John Doe physician assistant and Jane Doe #1 nurse practitioner were deliberately indifferent to Plaintiff's serious medical needs, so those individual-capacity claims may proceed to service.
2. The amended complaint failed to state official-capacity or supervisory-liability claims against Amoia and Garcia, and those claims were dismissed.
3. The amended complaint plausibly alleged a First Amendment access-to-courts claim against Lieutenant Groves based on missed matrimonial-court appearances between March and May 2025, and that claim may proceed to service.
4. The amended complaint failed to state an access-to-courts claim based on the alleged seizure of legal and medical documents because Plaintiff did not allege an actual injury from the loss.
5. The court denied Plaintiff a second opportunity to amend because the initial screening order had identified the deficiencies and the amended complaint did not suggest that another amendment would produce viable claims.

KEY QUOTATIONS

“[A] § 1983 suit against a municipal officer in his official capacity is treated as an action against the municipality itself.” (4)

“Mere disagreement over the proper treatment does not create a constitutional claim provided that the treatment given is adequate.” (6)

“that a defendant caused ‘actual injury,’ i.e., took or was responsible for actions that ‘hindered . . . efforts to pursue a [non-frivolous] legal claim[.]’” (8)

FACTUAL BACKGROUND

Plaintiff, formerly a pretrial detainee in Erie County custody, alleged severe neck and shoulder nerve pain and claimed that a physician assistant and nurse practitioner failed to provide effective medication or adequate diagnostic treatment. He also alleged that Lieutenant Groves and correctional officials failed to produce him for several matrimonial-court appearances, resulting in default-related orders and loss of marital assets and heirlooms. Plaintiff further alleged that legal and medical papers were taken during a bunk search, but he did not identify an actual legal injury resulting from that loss.

PROCEDURAL HISTORY

Plaintiff filed a § 1983 action and claims under a United Nations human-rights treaty. The initial screening order dismissed the treaty claims and claims against Erie County Correctional Facility and Erie County Correctional Health with prejudice, and dismissed the remaining claims with leave to amend. After screening the amended complaint, the court allowed certain Fourteenth Amendment medical-indifference claims and a First Amendment access-to-courts claim to proceed to service, dismissed the remaining claims, denied a second opportunity to amend, and directed the Erie County Attorney to identify the Doe defendants for service.

DISPOSITION

other

CASES CITED

- *Abbas v. Dixon*, 480 F.3d 636, 639 (2d Cir. 2007)
- *Gomez v. USAA Federal Savings Bank*, 171 F.3d 794, 796 (2d Cir. 1999)
- *Bivona v. McLean*, No. 9:19-CV-0303(MAD)(TWD), 2019 WL 2250553, at *5 (N.D.N.Y. May 24, 2019)
- *Cancel v. New York City Human Resources Administration/Department of Social Services*, 527 F. App'x 42, 44 (2d Cir. 2013)
- *Coon v. Town of Springfield*, 404 F.3d 683, 687 (2d Cir. 2005)
- *Brandon v. Holt*, 469 U.S. 464, 471-73 (1985)
- *Monell v. Department of Social Services*, 436 U.S. 658, 694 (1978)
- *Zahra v. Town of Southold*, 48 F.3d 674, 685 (2d Cir. 1995)
- *Batista v. Rodriguez*, 702 F.2d 393, 397 (2d Cir. 1983)

- Darnell v. Pineiro, 849 F.3d 17, 29-35 (2d Cir. 2017)
- Charles v. Orange County, 925 F.3d 73, 86 (2d Cir. 2019)
- Estelle v. Gamble, 429 U.S. 97, 105 (1976)
- Funderburke v. Canfield, No. 13-CV-6128-FPG, 2016 WL 831974, at *6 (W.D.N.Y. Feb. 29, 2016)
- Chance v. Armstrong, 143 F.3d 698, 703 (2d Cir. 1998)
- Rizzuto v. Morley, No. 9:23-CV-515 (BKS/PJE), 2025 WL 2726609, at *5 (N.D.N.Y. Sept. 25, 2025)
- Ying Li v. City of New York, 246 F. Supp. 3d 578, 638 (E.D.N.Y. 2017)
- Connick v. Thompson, 563 U.S. 51, 60 (2011)
- Monsky v. Moraghan, 127 F.3d 243, 247 (2d Cir. 1997)
- Lewis v. Casey, 518 U.S. 343, 349, 351 (1996)
- Kaminski v. Semple, 796 F. App'x 36, 39 (2d Cir. 2019)
- Davis v. Goord, 320 F.3d 346, 351 (2d Cir. 2003)
- DeMeo v. Tucker, 509 F. App'x 16, 18 (2d Cir. 2013)
- Chinloy v. Seabrook, No. 14-CV-350 (MKB), 2014 WL 1343023, at *2 (E.D.N.Y. Apr. 3, 2014)
- Dorlette v. Wu, No. 3:16-CV-318 (VAB), 2019 WL 1284812, at *10 (D. Conn. Mar. 20, 2019)
- Kim v. Kimm, 884 F.3d 98, 105 (2d Cir. 2018)
- National Credit Union Administration Board v. U.S. Bank National Association, 898 F.3d 243, 257 (2d Cir. 2018)
- Denny v. Barber, 576 F.2d 465, 471 (2d Cir. 1978)
- Williams v. Baxter, No. 22-CV-6117-EAW, 2023 WL 5584345, at *3 (W.D.N.Y. Aug. 29, 2023)
- Valentin v. Dinkins, 121 F.3d 72 (2d Cir. 1997)