

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

Edward Ditchfield v. Lincoln Correctional Center

Ditchfield · No. 3:25-cv-03114-SEM-DJQ · Decided February 27, 2026

SUMMARY

The court screened Edward Ditchfield’s pro se complaint under 28 U.S.C. § 1915A, alleging that a ceiling light fixture injured him and that he received inadequate medical care. The court concluded that the allegations did not state a claim because no knowledge of the hazardous fixture was alleged, the medical-care allegations lacked necessary details, and Lincoln Correctional Center was not a suable person; Ditchfield was given 30 days to seek leave to amend.

CASE DETAILS

COURT	United States District Court for the Central District of Illinois, Springfield Division
WRITING FOR THE COURT	Sue E. Myerscough
JURISDICTION	United States District Court for the Central District of Illinois, Springfield Division
DECIDED	February 27, 2026
DOCKET	3:25-cv-03114-SEM-DJQ
DISPOSITION	other
PROCEDURAL POSTURE	Pro se incarcerated plaintiff filed a prisoner civil-rights complaint alleging that a falling light fixture injured him and that his neck injury was not properly treated. The district court screened the complaint under 28 U.S.C. § 1915A and found that it failed to state a claim, while allowing plaintiff 30 days to seek leave to amend.
STANDARD OF REVIEW	At § 1915A screening, the court accepts factual allegations as true and liberally construes them in the plaintiff's favor, but conclusory statements and labels are insufficient; the complaint must state a claim that is plausible on its face.
PRECEDENTIAL VALUE	unpublished district court order

TOPICS

- prisoners rights
- section 1983
- civil rights
- pleadings
- civil procedure

PRACTICE AREAS

prisoner civil rights

constitutional law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the allegations that a ceiling light fixture fell and injured plaintiff stated an Eighth Amendment deliberate-indifference claim based on hazardous prison conditions.
2. Whether the allegations concerning inadequate treatment of plaintiff's neck injury stated an Eighth Amendment deliberate-indifference-to-medical-needs claim.
3. Whether Lincoln Correctional Center could be sued as a defendant in a civil-rights action.

HOLDINGS

1. The allegations that the light fixture fell and injured plaintiff did not state an Eighth Amendment claim because they did not indicate that anyone knew the fixture posed an imminent hazard.
2. The allegations concerning plaintiff's medical care did not state a claim because they did not identify the responsible individuals, the relevant time frame, or conduct amounting to intentional disregard of a serious medical need.
3. Lincoln Correctional Center, as a building or facility, was not a suable person for purposes of a civil-rights action; plaintiff was required to name responsible individuals or describe unknown John or Jane Doe defendants.
4. The complaint failed to state a claim for relief at § 1915A screening, but plaintiff was granted 30 days to seek leave to amend with a proposed amended complaint.

KEY QUOTATIONS

"A claim is legally insufficient if it "(1) is frivolous, malicious, or fails to state a claim upon which relief may be granted; or (2) seeks monetary relief from a defendant who is immune from such relief.""

"But he must indicate at a minimum 1) who he wants to hold responsible for his medical care (even if only by description or job title), 2) the time frame at issue related to his medical care, and 3) what that person or those persons did and/or did not do that he believes to be an intentional disregard for his serious medical needs."

FACTUAL BACKGROUND

Plaintiff was incarcerated at Lincoln Correctional Center and was lying in bed on February 14, 2025, when a ceiling light fixture fell, struck him, and injured his head and neck. He alleged that his neck injury was not being properly treated, but he did not identify responsible medical-care officials, the relevant treatment time frame, or conduct showing intentional disregard of a serious medical need.

PROCEDURAL HISTORY

Plaintiff brought an action under 42 U.S.C. § 1983 against Lincoln Correctional Center. On merit review under 28 U.S.C. § 1915A, the court concluded that the complaint did not state a claim for relief and granted plaintiff 30

days to file a motion for leave to amend with a proposed amended complaint; otherwise, the case would be dismissed without prejudice.

DISPOSITION

other

CASES CITED

- Turley v. Rednour, 729 F.3d 645, 649 (7th Cir. 2013)
- Alexander v. United States, 721 F.3d 418, 422 (7th Cir. 2013)
- Estate of Simpson v. Gorbett, 863 F.3d 740, 746 (7th Cir. 2017)
- Farmer v. Brennan, 511 U.S. 825, 844-45 (1994)
- Pyles v. Fahim, 771 F.3d 403, 408 (7th Cir. 2014)
- Anderson v. Morrison, 835 F.3d 681, 683 (7th Cir. 2016)
- Petties v. Carter, 836 F.3d 722, 729-30 (7th Cir. 2016) (en banc)

OPINION

Ditchfield

PER CURIAM.

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF ILLINOIS

SPRINGFIELD DIVISION

EDWARD DITCHFIELD,)

) Plaintiff,)) v.) 3:25-cv-03114-SEM-DJQ)

LINCOLN CORRECTIONAL)

CENTER,)

Defendant.

ORDER

Plaintiff, proceeding pro se and presently incarcerated at Lincoln Correctional Center, alleges Defendant violated his Eighth Amendment rights through deliberate indifference to his safety during his incarceration at Lincoln Correctional Center. The Court must “screen” Plaintiff’s complaint, and through such process identify and dismiss any legally insufficient claim, or the entire action if warranted. 28 U.S.C. § 1915A. A claim is legally insufficient if it “(1) is frivolous, malicious, or fails to state a claim upon which relief may be granted; or (2) seeks monetary relief from a defendant who is immune from such relief.” *Id.* The Court accepts the factual allegations as true, liberally construing them in the plaintiff’s favor. *Turley v. Rednour*, 729 F.3d 645, 649 (7th Cir. 2013). Conclusory statements and labels are insufficient—the facts alleged must “state a claim for relief that is plausible on its face.” *Alexander v. United States*, 721 F.3d 418, 422 (7th Cir. 2013) (citation omitted). Plaintiff names as Defendant Lincoln Correctional Center. He was lying

in bed on February 14, 2025, when the light fixture fell from the ceiling, hit him, and injured his head and neck. He asserts that his neck injury is not being properly treated. “The Eighth Amendment demands that officials ensure ‘reasonable safety.’” *Estate of Simpson v. Gorbett*, 863 F.3d 740, 746 (7th Cir. 2017) (quoting *Farmer v. Brennan*, 511 U.S. 825, 844–45 (1994)). Prisoners enjoy the right to be free from unnecessary infliction of pain caused by hazardous prison conditions. *Pyles v. Fahim*, 771 F.3d 403, 408 (7th Cir. 2014). A prison condition is hazardous when it “poses an unreasonable peril.” *Anderson v. Morrison*, 835 F.3d 681, 683 (7th Cir. 2016). When risk of injury is great and the prison condition is avoidable the Seventh Circuit has held that the condition poses a sufficient risk of harm to state a constitutional claim. *Anderson*, 835 F.3d at 683 (7th Cir. 2016). Likewise, deliberate indifference to a serious medical need violates a prisoner’s constitutional rights. This standard is higher than the standard for negligence and is instead akin to criminal recklessness. See *Petties v. Carter*, 836 F.3d 722, 729-30 (7th Cir. 2016) (en banc). Plaintiff’s allegations related to the light fixture falling and injuring him do not state a claim. There is no indication that anyone knew the light fixture posed an imminent hazard. Plaintiff’s allegations related to his medical care do not state a claim. He need not provide a great deal of detail about what has occurred. But he must indicate at a minimum 1) who he wants to hold responsible for his medical care (even if only by description or job title), 2) the time frame at issue related to his medical care, and 3) what that person or those persons did and/or did not do that he believes to be an intentional disregard for his serious medical needs. A building or facility, such as Lincoln Correctional Center, is not a suable “person” for purposes of a civil rights lawsuit like this one. Plaintiff must name individuals or describe to the best of his ability any unknown “John/Jane Doe” individuals that he wishes to sue. IT IS THEREFORE ORDERED:

1. Pursuant to its merit review of the Complaint under 28

U.S.C. § 1915A, Plaintiff has not stated a claim for relief. Plaintiff is allowed 30 days to file a motion for leave to amend with an attached proposed amended complaint. If Plaintiff does not do so the case will be dismissed without prejudice. Entered this 27th day of February, 2026. s/Sue E. Myerscough

SUE E. MYERSCOUGH

UNITED STATES DISTRICT JUDGE