

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
ILLINOIS

Bridgette Hart v. Illinois Department of Corrections, et al.

Hart · No. 26-3096 · Decided April 27, 2026

SUMMARY

In this merit review order, the United States District Court for the Central District of Illinois screened Bridgette Hart’s amended 42 U.S.C. § 1983 complaint concerning allegedly inadequate prenatal care during a high-risk pregnancy. The court allowed an Eighth Amendment deliberate-indifference claim to proceed against Unknown Medical Staff and Warden Melinda Eddy in her official capacity, while dismissing the Illinois Department of Corrections and Logan Correctional Center with prejudice and the IDOC Medical Director without prejudice.

CASE DETAILS

COURT	United States District Court for the Central District of Illinois
WRITING FOR THE COURT	Michael M. Mihm
JURISDICTION	United States District Court for the Central District of Illinois
DECIDED	April 27, 2026
DOCKET	26-3096
DISPOSITION	other
PROCEDURAL POSTURE	Merit review and screening of a pro se incarcerated plaintiff's amended complaint under 28 U.S.C. § 1915A.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915A, the court screens the complaint and dismisses claims that are frivolous, malicious, fail to state a claim, or seek monetary relief from an immune defendant. The court accepts well-pleaded factual allegations as true and liberally construes them in the plaintiff's favor, but conclusory statements and labels are insufficient.
PRECEDENTIAL VALUE	unpublished and nonprecedential district court order
PARTIES	Bridgette Hart v. Illinois Department of Corrections, Logan Correctional Center, Unknown Medical Staff, Melinda Eddy, in her official capacity as Warden of Logan Correctional Center

TOPICS

prisoners rights

section 1983

cruel and unusual punishment

service of process

injunctions

PRACTICE AREAS

prisoner civil rights

constitutional law

health law

civil procedure

QUESTIONS PRESENTED

1. Whether Hart's allegations of inadequate prenatal care during a high-risk pregnancy stated an Eighth Amendment deliberate-indifference claim under 42 U.S.C. § 1983.
2. Whether the warden was a proper defendant for purposes of Hart's requested injunctive relief despite the absence of allegations of the warden's personal involvement.
3. Whether the Illinois Department of Corrections and Logan Correctional Center were persons subject to suit under § 1983 and were immune from a damages action.
4. Whether the Medical Director of the Illinois Department of Corrections should remain a defendant when the amended complaint did not name that person.

HOLDINGS

1. Allegations that prison medical staff denied proper prenatal care for a very high-risk pregnancy were sufficient at the § 1915A screening stage to proceed on an Eighth Amendment deliberate-indifference claim against Unknown Medical Staff.
2. The warden was a proper defendant in her official capacity because Hart sought injunctive relief, even though Hart did not allege the warden's personal involvement in the underlying violations.
3. The action could proceed against Unknown Medical Staff, and Hart could propound limited written discovery to Warden Eddy aimed solely at identifying the Doe defendants.
4. The Illinois Department of Corrections and Logan Correctional Center were not persons amenable to suit under § 1983 and were immune from a suit for money damages; they were dismissed with prejudice.

KEY QUOTATIONS

“The Court finds that Plaintiff’s allegations are sufficient to proceed on an Eighth Amendment deliberate indifference claim against Unknown Medical Staff based on the alleged denial of proper prenatal care for Plaintiff’s high-risk pregnancy.”

“Although Plaintiff does not allege any specific involvement by the warden of Logan Correctional Center, the warden is a proper defendant since Plaintiff seeks injunctive relief.”

“Plaintiff named the IDOC and Logan as Defendants, but the IDOC and Logan are not “persons” amenable to suit under § 1983 and have Eleventh Amendment immunity in a suit for money damages.”

FACTUAL BACKGROUND

Bridgette Hart, an incarcerated person at Logan Correctional Center, alleged that she was approximately thirty weeks pregnant and had not received adequate prenatal care despite her pregnancy being identified as very high

risk. She alleged that her requests for prenatal care, including ultrasounds and proper monitoring, were denied or treated as non-emergent, creating a serious risk of harm to her and her unborn child. She sought monetary damages and injunctive relief, including immediate adequate prenatal care and transfer, early release, or home confinement.

PROCEDURAL HISTORY

Bridgette Hart filed an amended complaint under 42 U.S.C. § 1983 alleging that she was denied adequate prenatal care during a high-risk pregnancy in violation of the Eighth Amendment. On merit review, the court allowed an Eighth Amendment deliberate-indifference claim to proceed against Unknown Medical Staff and Melinda Eddy in her official capacity for injunctive relief. The court dismissed the IDOC and Logan Correctional Center with prejudice and dismissed the IDOC Medical Director 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)
- Hayes v. Snyder, 546 F.3d 516, 522 (7th Cir. 2008)
- Farmer v. Brennan, 511 U.S. 825, 834, 837 (1994)
- Holloway v. Delaware Cnty. Sheriff, 700 F.3d 1063, 1073 (7th Cir. 2012)
- Est. of Unborn Child of Jawson v. Milwaukee Cnty., No. 19-C-1008, 2020 WL 4815809, at *3 (E.D. Wis. Aug. 19, 2020)
- Est. of Swayzer v. Milwaukee Cnty., No. 16-CV-1703-BHL, 2022 WL 656884, at *11 (E.D. Wis. Mar. 4, 2022)
- Doe v. Gustavus, 294 F. Supp. 2d 1003, 1008 (E.D. Wis. 2003)
- Gonzalez v. Feinerman, 663 F.3d 311, 315 (7th Cir. 2011)
- Donald v. Cook County Sheriff's Department, 95 F.3d 548, 556 (7th Cir. 1996)
- Will v. Michigan Department of State Police, 491 U.S. 58, 71 (1989)
- Wynn v. Southward, 251 F.3d 588, 592 (7th Cir. 2001)