

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Brannon Achimbi v. Officer Owoeye

Achimbi · No. 1:24-cv-1507-LKG · Decided April 30, 2026

SUMMARY

The United States District Court for the District of Maryland grants Officer Adebayo Owoeye’s motion for summary judgment in Brannon Achimbi’s civil rights action arising from a finger injury sustained when a detention-cell door was closed. The court concludes that the alleged excessive-force claim involves, at most, negligence and that Owoeye’s response to the medical issue did not constitute deliberate indifference under the Fourteenth Amendment. The court also denies Achimbi’s requests for pro bono counsel.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Lydia Kay Griggsby
JURISDICTION	United States District Court for the District of Maryland
DECIDED	April 30, 2026
DOCKET	1:24-cv-1507-LKG
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved for summary judgment in a prisoner civil-rights action. Plaintiff did not oppose the motion and instead requested appointment of pro bono counsel.
STANDARD OF REVIEW	Under Federal Rule of Civil Procedure 56(a), summary judgment is proper when there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The court views the evidence in the light most favorable to the nonmovant and draws reasonable inferences in that party's favor, but unsupported allegations and denials are insufficient to create a genuine dispute.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Brannon Achimbi v. Officer Adebayo Owoeye

TOPICS

- summary judgment
- prisoners rights
- civil rights
- fourteenth amendment
- due process

PRACTICE AREAS

civil rights

prisoner litigation

constitutional torts

summary judgment

QUESTIONS PRESENTED

1. Whether the undisputed evidence supported an excessive-force claim under the Fourteenth Amendment when the plaintiff's finger was injured as a cell door was closed.
2. Whether the defendant was deliberately indifferent to the plaintiff's serious medical need under the Fourteenth Amendment by failing to provide or obtain appropriate medical care after learning that the plaintiff's finger was caught in the door.
3. Whether summary judgment was appropriate when the plaintiff did not oppose the properly supported motion with evidence creating a genuine dispute of material fact.

HOLDINGS

1. The defendant was entitled to summary judgment on any excessive-force claim because the undisputed evidence showed that the cell door closure was not intentional force directed against Achimbi; at most, the injury resulted from negligence, which does not constitute a constitutional due-process violation.
2. The defendant was entitled to summary judgment on any denial-of-medical-care claim because the injury did not pose a substantial risk of serious harm requiring Owøeye to take additional action beyond reporting the injury, and Achimbi received medical care within a reasonable period.
3. Summary judgment was proper because the defendant supported his motion with evidence and Achimbi did not identify specific facts showing a genuine issue for trial.

KEY QUOTATIONS

"At most, the injury to Achimbi's finger was the result of negligence, which is not an appropriate basis for a constitutional rights violation." (Analysis § III.A)

"Achimbi received emergent medical care for his finger, despite his oppositional behavior toward medical staff, within a reasonable period of time." (Analysis § III.B)

FACTUAL BACKGROUND

Achimbi, a pretrial detainee at the Baltimore County Detention Center, alleged that Officer Owøeye closed a cell door on his finger, causing a serious laceration that required nine stitches. Owøeye provided a declaration stating that he was securing Achimbi's cellmate in the cell, was initially unaware that Achimbi's finger was caught in the door, and notified a supervisor when Achimbi reported the injury. Achimbi was taken to medical care and later to a hospital, although he alleged a delay and inadequate treatment.

PROCEDURAL HISTORY

The court previously denied defendant's motion to dismiss, rejecting an unsupported exhaustion defense and finding the qualified-immunity defense unsupported by evidence. Defendant then submitted a declaration and

supporting records with his summary-judgment motion. The court granted summary judgment for defendant, denied plaintiff's requests for pro bono counsel, and directed that judgment be entered in defendant's favor.

DISPOSITION

other

CASES CITED

- Dennis v. Columbia Colleton Medical Center, Inc., 290 F.3d 639, 645 (4th Cir. 2002)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 247-50 (1986)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Bouchat v. Baltimore Ravens Football Club, Inc., 346 F.3d 514, 526 (4th Cir. 2003)
- Drewitt v. Pratt, 999 F.2d 774, 778-79 (4th Cir. 1993)
- Celotex Corp. v. Catrett, 477 U.S. 317, 323-24 (1986)
- Young v. City of Mount Ranier, 238 F.3d 567, 575 (4th Cir. 2001)
- Hill v. Nicodemus, 979 F.2d 987, 991-92 (4th Cir. 1992)
- Kingsley v. Hendrickson, 576 U.S. 389, 395-97 (2015)
- Dilworth v. Adams, 841 F.3d 246, 255 (4th Cir. 2016)
- Bell v. Wolfish, 441 U.S. 520, 540 (1979)
- County of Sacramento v. Lewis, 523 U.S. 833, 849 (1988)
- Short v. Hartman, 87 F.4th 593, 608-11 (4th Cir. 2023)

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