

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF CONNECTICUT

Jeffrey Hall v. Dr. Ashraf

Hall v. Ashraf, No. 3:25-CV-1074 (SVN) (D. Conn. Dec. 4, 2025) · No. 3:25-CV-1074 (SVN) · Decided December 4, 2025

SUMMARY

The United States District Court for the District of Connecticut conducted an initial review of Jeffrey Hall’s amended pro se prisoner civil rights complaint under the Prison Litigation Reform Act. The court permitted an Eighth Amendment deliberate-indifference claim for monetary damages against Dr. Ashraf in his individual capacity, while dismissing the First Amendment retaliation claim against Warden Caron and requests for injunctive relief.

CASE DETAILS

COURT	United States District Court for the District of Connecticut
WRITING FOR THE COURT	Sarala V. Nagala
JURISDICTION	United States District Court for the District of Connecticut
DECIDED	December 4, 2025
DOCKET	3:25-CV-1074 (SVN)
DISPOSITION	other
PROCEDURAL POSTURE	Initial review of a pro se prisoner's amended civil-rights complaint under the Prison Litigation Reform Act, 28 U.S.C. § 1915A.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915A, the court reviewed the amended complaint to determine whether it was frivolous or malicious, failed to state a claim, or sought monetary relief from an immune defendant. The court accepted the factual allegations as true for initial review and applied the plausibility standard, construing the pro se pleading liberally.
PRECEDENTIAL VALUE	Nonprecedential district-court initial review order; precedential status unknown in the source metadata.
PARTIES	Jeffrey Hall v. Dr. Ashraf

TOPICS

- prisoners rights
- section 1983
- cruel and unusual punishment
- first amendment
- civil procedure

PRACTICE AREAS

civil rights

constitutional law

prisoners rights

health law

civil procedure

QUESTIONS PRESENTED

1. Whether Hall's request for injunctive relief was moot after his transfer to a different correctional facility.
2. Whether Hall plausibly alleged an Eighth Amendment deliberate-indifference claim based on the seriousness of his dermatological condition and alleged delays in effective treatment.
3. Whether Hall plausibly alleged a First Amendment retaliation claim based on his transfer after filing lawsuits.
4. Whether claims against the defendants in their official capacities could proceed when injunctive relief was unavailable.

HOLDINGS

1. Hall's transfer from Carl Robinson Correctional Institution mooted his request for injunctive relief directed at that facility.
2. To the extent Hall sued Dr. Ashraf or Warden Caron in their official capacities, those claims were dismissed because injunctive relief was unavailable and the remaining relief sought was monetary.
3. Hall sufficiently alleged, at the initial-review stage, that his dermatological condition and the delays in receiving effective treatment were objectively serious.
4. Hall sufficiently alleged that Dr. Ashraf was aware of a substantial risk of serious harm and deliberately failed to provide effective care, allowing the individual-capacity claim for damages to proceed.
5. Hall failed to state a First Amendment retaliation claim against Warden Caron because he alleged no facts supporting a causal connection between his lawsuits and the transfer.

KEY QUOTATIONS

"Deliberate indifference is a mental state equivalent to subjective recklessness, as the term is used in criminal law." (Discussion § II.B)

"The filing of lawsuits is protected activity." (Discussion § II.C)

FACTUAL BACKGROUND

Hall, a sentenced Connecticut inmate, alleged that he developed a painful rash that spread to his arms and legs, produced open or pus-filled sores and scarring, and caused persistent pain and itching. He alleged that Dr. Ashraf diagnosed perivascular lymphocytic dermatitis, prescribed medication and steroid cream that did not resolve the condition, and ignored repeated requests for effective treatment until Hall filed multiple grievances. Hall also alleged that Warden Caron transferred him in retaliation for filing lawsuits; after the transfer, Hall obtained treatment from new providers and experienced some alleviation of his symptoms.

PROCEDURAL HISTORY

The court previously construed Hall's petition as a civil-rights complaint, dismissed the initial complaint, and granted leave to amend. After Hall filed an amended petition, the court construed it as an amended § 1983 complaint because it sought damages and injunctive relief rather than release from custody. On initial review, the court dismissed the First Amendment retaliation claim and requests for injunctive relief, but permitted an Eighth Amendment deliberate-indifference claim for damages against Dr. Ashraf in his individual capacity to proceed.

DISPOSITION

other

CASES CITED

- Mangiafico v. Blumenthal, 471 F.3d 391, 398 (2d Cir. 2006)
- Kelley v. Quiros, No. 3:22-CV-1425 (KAD), 2023 WL 1818545, at *2 (D. Conn. Feb. 8, 2023)
- Sykes v. Bank of America, 723 F.3d 399, 403 (2d Cir. 2013)
- Triestman v. Federal Bureau of Prisons, 470 F.3d 471, 474 (2d Cir. 2006)
- Tracy v. Freshwater, 623 F.3d 90, 101-02 (2d Cir. 2010)
- Fowlkes v. Ironworkers Local 40, 790 F.3d 378, 387 (2d Cir. 2015)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555, 557 (2007)
- Prins v. Coughlin, 76 F.3d 504, 506 (2d Cir. 1996)
- Will v. Michigan Department of State Police, 491 U.S. 58, 71 n.10 (1989)
- Spavone v. New York State Department of Correctional Services, 719 F.3d 127, 138 (2d Cir. 2013)
- Estelle v. Gamble, 429 U.S. 97, 104 (1976)
- Hathaway v. Coughlin, 37 F.3d 63, 66 (2d Cir. 1994)
- Foote v. Hathaway, 513 U.S. 1154 (1995)
- Valdiviezo v. Boyer, 752 F. App'x 29, 32 (2d Cir. 2018)
- Salahuddin v. Goord, 467 F.3d 263, 280-81 (2d Cir. 2006)
- Kravitz v. Purcell, 87 F.4th 111, 119, 122 (2d Cir. 2023)
- Chance v. Armstrong, 143 F.3d 698, 702-03 (2d Cir. 1998)
- Brock v. Wright, 315 F.3d 158, 163 (2d Cir. 2003)
- Lewal v. Wiley, 29 F. App'x 26, 29 (2d Cir. 2002)
- Gist v. Sommer, No. 14 CV 6736 (VB), 2020 WL 905689, at *7 (S.D.N.Y. Feb. 24, 2020)
- Rodriguez v. Bipin, 2023 WL 3260129, at *5-6 (N.D.N.Y. Mar. 30, 2023)
- Rodriguez v. Bhavsar, 2023 WL 3251522 (N.D.N.Y. May 4, 2023)
- Dolan v. Connolly, 794 F.3d 290, 294-95 (2d Cir. 2015)
- Espinal v. Goord, 558 F.3d 119, 128 (2d Cir. 2009)
- Davis v. Goord, 320 F.3d 346, 352 (2d Cir. 2003)
- Meriwether v. Coughlin, 879 F.2d 1037, 1046 (2d Cir. 1989)

- Conquistador v. Syed, No. 3:19-CV-1450 (KAD), 2020 WL 229319, at *3 (D. Conn. Jan. 15, 2020)

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