

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF  
PENNSYLVANIA

Williams v. Polemitis, et al.

Williams v. Polemitis, No. 3:25cv2294 (M.D. Pa. Dec. 17, 2025) · No. No. 3:25cv2294 · Decided December 17, 2025

SUMMARY

The United States District Court for the Middle District of Pennsylvania screened Paris Williams’s amended 42 U.S.C. § 1983 complaint. The court dismissed the claims against Jennifer Polemitis, Tim Betty, Jason Talutto, and Colleen Orzel because their alleged involvement in reviewing or denying grievances did not establish personal involvement in an underlying constitutional violation. The court allowed an excessive-force claim against Correctional Officer Cadden to proceed and directed service of the amended complaint on Cadden.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                        |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Middle District of Pennsylvania                                                                                                                                                                                                                   |
| WRITING FOR THE COURT | Julia K. Munley                                                                                                                                                                                                                                                                        |
| JURISDICTION          | United States District Court for the Middle District of Pennsylvania                                                                                                                                                                                                                   |
| DECIDED               | December 17, 2025                                                                                                                                                                                                                                                                      |
| DOCKET                | No. 3:25cv2294                                                                                                                                                                                                                                                                         |
| DISPOSITION           | other                                                                                                                                                                                                                                                                                  |
| PROCEDURAL POSTURE    | Pro se prisoner civil-rights action under 42 U.S.C. § 1983 reviewed on preliminary screening under 28 U.S.C. § 1915A(a) and related prisoner-screening provisions.                                                                                                                     |
| STANDARD OF REVIEW    | The court applied the Rule 12(b)(6) failure-to-state-a-claim standard in conducting preliminary screening under 28 U.S.C. §§ 1915(e)(2) and 1915A and 42 U.S.C. § 1997e(c), construing the pro se pleading liberally and accepting well-pleaded allegations for purposes of screening. |
| PRECEDENTIAL VALUE    | unpublished                                                                                                                                                                                                                                                                            |
| PARTIES               | Paris Williams v. Jennifer Polemitis, Tim Betty, Jason Talutto, Colleen Orzel, Correctional Officer Cadden                                                                                                                                                                             |

TOPICS

section 1983

prisoners rights

police misconduct

civil rights

pleadings

## PRACTICE AREAS

Civil rights

Prisoner litigation

Constitutional torts

Federal civil procedure

## QUESTIONS PRESENTED

1. Whether Williams adequately alleged personal involvement by Polemitis, Betty, Talutto, and Orzel in an underlying constitutional violation based on their handling or denial of his prison grievances and appeals.
2. Whether Williams plausibly stated an excessive-force claim against Cadden by alleging that Cadden pushed him without warning into a metal door, causing dental injuries.
3. Whether further leave to amend the claims against Polemitis, Betty, Talutto, and Orzel would be futile.

## HOLDINGS

1. Williams failed to state a § 1983 claim against Polemitis, Betty, Talutto, and Orzel because allegations that they denied or reviewed his grievances and appeals did not establish personal involvement in the underlying alleged constitutional violation, and prisoners have no constitutional right to a prison grievance procedure.
2. Williams stated a plausible excessive-force claim against Cadden by alleging that Cadden pushed him without warning into a metal door, causing injury to his teeth.
3. Further leave to amend the claims against Polemitis, Betty, Talutto, and Orzel would be futile because Williams had already been granted leave to amend and failed to cure the personal-involvement deficiencies.

## KEY QUOTATIONS

*“Inmates do not have a constitutional right to prison grievance procedures.” (at 4)*

*“At this early screening stage of the litigation, Williams has stated an excessive force claim against defendant Cadden, and the amended complaint will thus be permitted to proceed against Cadden.” (at 5)*

## FACTUAL BACKGROUND

Williams, an inmate at Lackawanna County Prison, alleged that Correctional Officer Cadden pushed him into a metal door on January 30, 2025, damaging his teeth. Williams also alleged that prison grievance officials and administrators failed to process or denied grievances and appeals concerning the incident, including grievances against Polemitis herself. He sought monetary damages and removal or imprisonment of the defendants.

## PROCEDURAL HISTORY

Williams initially filed a civil-rights complaint, was granted leave to proceed in forma pauperis, and had the original complaint dismissed with leave to amend. After Williams filed an amended complaint, the court

screened it and dismissed the claims against Polemitis, Betty, Talutto, and Orzel for failure to state a claim, while allowing the excessive-force claim against Cadden to proceed and directing service.

## DISPOSITION

other

## CASES CITED

- Brodzki v. Tribune Co., 481 F. App'x 705, 706 (3d Cir. 2012) (per curiam)
- Mitchell v. Dodrill, 696 F. Supp. 2d 454, 471 (M.D. Pa. 2010)
- Gonzaga University v. Doe, 536 U.S. 273, 284-85 (2002)
- Kneipp v. Tedder, 95 F.3d 1199, 1204 (3d Cir. 1996)
- Mark v. Borough of Hatboro, 51 F.3d 1137, 1141 (3d Cir. 1995)
- Emil Jutrowski v. Township of Riverdale, Jutrowski v. Township of Riverdale, 904 F.3d 280, 289 (3d Cir. 2018)
- Rode v. Dellarciprete, 845 F.2d 1195, 1207 (3d Cir. 1988)
- Dooley v. Wetzel, 957 F.3d 366, 374 (3d Cir. 2020)
- Jackson v. Gordon, 145 F. App'x 774, 777 (3d Cir. 2005) (per curiam)
- Pressley v. Beard, 266 F. App'x 216, 218 (3d Cir. 2008)
- Brooks v. Beard, 167 F. App'x 923, 925 (3d Cir. 2006)
- Simonton v. Tennis, 437 F. App'x 60, 62 (3d Cir. 2011) (nonprecedential)
- Alexander v. Gennarini, 144 F. App'x 924, 925 (3d Cir. 2005)
- Whitley v. Albers, 475 U.S. 312, 320-21 (1986)
- Drumgo v. Radcliff, Sgt., 661 F. App'x 758, 760 (3d Cir. 2016)
- Brooks v. Kyler, 204 F.3d 102, 106 (3d Cir. 2000)
- Phillips v. Allegheny County, 515 F.3d 224, 245 (3d Cir. 2008)
- Jones v. Unknown D.O.C. Bus Driver & Transportation Crew, 944 F.3d 478, 483 (3d Cir. 2019)