

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Xavier Epps v. Becky Scott, et al.

Epps v. Scott, No. 2:25-cv-18480 (BRM)(AME) (D.N.J. Jan. 22, 2026) · No. 2:25-cv-18480 (BRM)(AME) ·
Decided January 22, 2026

SUMMARY

The United States District Court for the District of New Jersey dismisses without prejudice Xavier Epps’s pro se 42 U.S.C. § 1983 complaint concerning alleged inadequate medical care while detained at Hudson County Correctional Center. The court finds insufficient allegations of supervisory liability, deliberate indifference, and personal involvement, and grants Plaintiff thirty days to file an amended complaint.

CASE DETAILS

COURT	United States District Court for the District of New Jersey
WRITING FOR THE COURT	Brian R. Martinotti
JURISDICTION	United States District Court for the District of New Jersey
DECIDED	January 22, 2026
DOCKET	2:25-cv-18480 (BRM)(AME)
DISPOSITION	dismissed
PROCEDURAL POSTURE	The pro se plaintiff filed a 42 U.S.C. § 1983 civil-rights complaint and an application to proceed in forma pauperis. The district court granted leave to proceed in forma pauperis, screened the complaint under the Prison Litigation Reform Act, and dismissed it without prejudice for failure to state a claim.
STANDARD OF REVIEW	Under the PLRA, the court must dismiss a prisoner complaint that is frivolous, malicious, fails to state a claim, or seeks monetary relief from an immune defendant. On failure-to-state-a-claim screening, the court accepts well-pleaded factual allegations as true, construes pro se pleadings liberally, and applies the facial-plausibility standard of Ashcroft v. Iqbal and Bell Atlantic Corp. v. Twombly.
PRECEDENTIAL VALUE	unpublished
PARTIES	Xavier Epps v. Becky Scott, Sharonda Murrell, Michael D'Antico, Maxim Casas, Dr. Canigilia, Dr. Benjamin, Baeza, Smith, Nurse Pincher

TOPICS

prisoners rights

section 1983

due process

fourteenth amendment

motions to dismiss

PRACTICE AREAS

prisoner civil rights

constitutional law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the complaint plausibly alleged supervisory liability under 42 U.S.C. § 1983 against the administrators of Hudson County Correctional Center.
2. Whether the complaint plausibly alleged Fourteenth Amendment deliberate indifference to medical needs against Dr. Benjamin, Baeza, and Smith.
3. Whether claims against Scott, Murrell, and Dr. Caniglia failed because the complaint alleged no personal involvement by those defendants.
4. Whether the complaint should be dismissed without prejudice under the PLRA screening provisions.

HOLDINGS

1. A § 1983 plaintiff cannot impose supervisory liability merely because defendants are administrators; the complaint must allege personal involvement or identify a policy, practice, or custom that caused the constitutional injury and plead the required causal and knowledge elements. Epps's allegations against D'Antico and Casas did not satisfy that standard.
2. A pretrial detainee must allege a serious medical need and conduct by prison officials amounting to deliberate indifference. Epps failed to state such a claim against Dr. Benjamin, Baeza, and Smith because he did not provide sufficient facts about his medical condition, the treatment or medication required, the alleged emergency, or each defendant's awareness and deliberate indifference.
3. A § 1983 claim requires allegations that each defendant was personally involved in the alleged constitutional violation. Claims against Scott, Murrell, and Dr. Caniglia were properly dismissed because they were named in the caption but not implicated by any factual allegation.

KEY QUOTATIONS

“To survive sua sponte screening for failure to state a claim, the complaint must allege “sufficient factual matter” to show the claim is facially plausible.” (II)

“Because vicarious liability is inapplicable to . . . § 1983 suits, a plaintiff must plead that each Government-official defendant, through the official’s own individual actions, has violated the Constitution.” (III.A.3)

FACTUAL BACKGROUND

Epps was a pretrial detainee confined at Hudson County Correctional Center. He alleged that staff members failed to ensure that he received medication for Crohn's disease, failed to call a medical emergency, and declined to send him outside the facility because of cost. He did not identify his specific medical needs, the medication

required, the treatment provided, or facts showing that the supervisory defendants or several named defendants were personally involved.

PROCEDURAL HISTORY

Epps, a pretrial detainee at Hudson County Correctional Center, filed a prisoner civil-rights complaint alleging denial of medication and inadequate medical care. The court granted in forma pauperis status and conducted sua sponte screening under 28 U.S.C. §§ 1915(e)(2)(B) and 1915A. It dismissed all claims without prejudice and allowed thirty days to file an amended complaint.

DISPOSITION

dismissed

CASES CITED

- Phillips v. County of Allegheny, 515 F.3d 224, 228 (3d Cir. 2008)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555 (2007)
- Fowler v. UPMC Shadyside, 578 F.3d 203, 210 (3d Cir. 2009)
- Belmont v. MB Investment Partners, Inc., 708 F.3d 470, 483 n.17 (3d Cir. 2013)
- Mala v. Crown Bay Marina, Inc., 704 F.3d 239, 245 (3d Cir. 2013)
- West v. Atkins, 487 U.S. 42, 48 (1988)
- Malleus v. George, 641 F.3d 560, 563 (3d Cir. 2011)
- Betts v. New Castle Youth Development Center, 621 F.3d 249, 256 (3d Cir. 2010)
- Farmer v. Brennan, 511 U.S. 825, 832, 835 (1994)
- Roman v. DeMarco, No. 18-8010, 2019 WL 452736, at *2 (D.N.J. Feb. 5, 2019)
- Reynolds v. Wagner, 128 F.3d 166, 173-74 (3d Cir. 1997)
- Doe v. New Jersey Department of Corrections, No. 14-5284, 2015 WL 3448233, at *9 (D.N.J. May 29, 2015)
- Rode v. Dellarciprete, 845 F.2d 1195, 1207 (3d Cir. 1988)
- Shaw by Strain v. Strackhouse, 920 F.2d 1135, 1147 (3d Cir. 1990)
- Beers-Capitol v. Whetzel, 256 F.3d 120, 134 (3d Cir. 2001)
- Sample v. Diecks, 885 F.2d 1099, 1118 (3d Cir. 1989)
- Hope v. Warden York County Prison, 972 F.3d 310, 326 (3d Cir. 2020)
- Bell v. Wolfish, 441 U.S. 520, 540 n.23, 545-46 (1979)
- Bocchino v. City of Atlantic City, 179 F. Supp. 3d 387, 403 (D.N.J. 2016)
- Estelle v. Gamble, 429 U.S. 97, 106 (1976)
- Natale v. Camden County Correctional Facility, 318 F.3d 575, 582 (3d Cir. 2003)

