

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
GEORGIA, COLUMBUS DIVISION

Bennie Mae Snead v. Georgia Department of Corrections, et al.

Snead · No. 4:23-CV-153 (CDL) · Decided January 29, 2026

SUMMARY

The United States District Court for the Middle District of Georgia grants the Georgia Department of Corrections’ motion for summary judgment on claims under Title II of the Americans with Disabilities Act and § 504 of the Rehabilitation Act. The court concludes that the plaintiff failed to present evidence that prison officials had actual knowledge of a substantial likelihood of disability-based discrimination or were deliberately indifferent to such a risk.

CASE DETAILS

COURT	United States District Court for the Middle District of Georgia, Columbus Division
WRITING FOR THE COURT	Clay D. Land
JURISDICTION	United States District Court for the Middle District of Georgia, Columbus Division
DECIDED	January 29, 2026
DOCKET	4:23-CV-153 (CDL)
DISPOSITION	other
PROCEDURAL POSTURE	Defendant Georgia Department of Corrections moved for summary judgment on Plaintiff’s claims under Title II of the Americans with Disabilities Act and § 504 of the Rehabilitation Act.
STANDARD OF REVIEW	Summary judgment is proper when the movant shows that there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The evidence is viewed in the light most favorable to the nonmovant, and a factual dispute is genuine if the evidence would allow a reasonable jury to return a verdict for the nonmoving party.
PRECEDENTIAL VALUE	unpublished district court order; precedential status not stated
PARTIES	Bennie Mae Snead v. Georgia Department of Corrections, et al.

TOPICS

summary judgment

ada / disability

reasonable accommodation

prisoners rights

civil rights

PRACTICE AREAS

Civil rights

Disability discrimination

Prisoner rights

Summary judgment

QUESTIONS PRESENTED

1. Whether GDC was entitled to summary judgment on Snead's Title II ADA and § 504 Rehabilitation Act disability-discrimination claims.
2. Whether the evidence created a genuine dispute that a prison official with authority to institute corrective measures had actual knowledge that Mincey faced a substantial likelihood of harm to a federally protected right because of his hearing loss and nevertheless failed to act.
3. Whether GDC's alleged failure to follow its reasonable-accommodation policy regarding single-occupancy cells established deliberate indifference.

HOLDINGS

1. GDC was entitled to summary judgment because Snead failed to present sufficient evidence that a prison official with authority to institute corrective measures knew that Mincey faced harm to a federally protected right because of his hearing loss or failed to act despite that knowledge.
2. The alleged failure to follow GDC's reasonable-accommodation policy did not establish deliberate indifference because Snead failed to show that Mincey met the policy's criteria or that officials had subjective awareness of a disability-related risk of harm and failed to act.
3. Summary judgment is proper only when there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law.

KEY QUOTATIONS

“To hold a government entity liable for deliberate indifference, a plaintiff must show that an official with authority “to address the alleged discrimination and to institute corrective measures” on behalf of the public entity had “actual knowledge of discrimination in the [entity’s] programs” but failed “adequately to respond.””

“Even if Plaintiff had pointed to such evidence, failure to follow a prison policy “does not, by itself, rise to the level of deliberate indifference.””

FACTUAL BACKGROUND

Curtis Mincey was incarcerated at Rutledge State Prison, operated by the Georgia Department of Corrections, and had hearing loss requiring hearing aids and other accommodations. Prison records showed difficulties with his hearing aids, including reports that they malfunctioned or were broken, and officials later issued a hearing notification watch. Mincey was placed in administrative segregation with another inmate, Joshua Starks, and was killed in his cell on July 21, 2021; his death was ruled a homicide. Snead argued that GDC discriminated

against Mincey because of his disability by failing to accommodate his hearing loss and by housing him with a cellmate.

PROCEDURAL HISTORY

Snead brought disability-discrimination claims arising from the death of her incarcerated brother, Curtis Mincey, at Rutledge State Prison. After discovery was completed on those claims, the Georgia Department of Corrections moved for summary judgment. The court granted the motion; a footnote states that Snead's separate motion for leave to amend to add claims under 42 U.S.C. § 1983 was addressed in a separate order.

DISPOSITION

other

CASES CITED

- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248, 255 (1986)
- Silberman v. Miami Dade Transit, 927 F.3d 1123, 1133-34 (11th Cir. 2019)
- Christmas v. Nabors, 76 F.4th 1320, 1333 (11th Cir. 2023)
- J.S., III ex rel. J.S. Jr. v. Houston County Board of Education, 877 F.3d 979, 985, 987 (11th Cir. 2017)
- Ingram v. Kubik, 30 F.4th 1241, 1257, 1259 (11th Cir. 2022)
- Liese v. Indian River County Hospital District, 701 F.3d 334, 344 (11th Cir. 2012)
- Taylor v. Adams, 221 F.3d 1254, 1259 (11th Cir. 2000)