

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
INDIANA, INDIANAPOLIS DIVISION

William Scott Sloan v. Sheriff Dwayne Burgess et al.

Sloan v. Burgess · No. 1:23-cv-01680-TWP-TAB · Decided February 10, 2026

SUMMARY

The United States District Court for the Southern District of Indiana granted Defendants' renewed motion for summary judgment in William Scott Sloan's Fourteenth Amendment failure-to-protect action arising from an assault by another detainee at the Johnson County Jail. The court concluded that Sloan's decision to confront the other detainee was an unforeseeable superseding cause of his injuries and that no reasonable jury could find the defendants caused them. The court denied the defendants' original summary-judgment motion as moot and directed corrections to two defendants' names.

CASE DETAILS

COURT	United States District Court for the Southern District of Indiana, Indianapolis Division
WRITING FOR THE COURT	Tanya Walton Pratt
JURISDICTION	United States District Court for the Southern District of Indiana
DECIDED	February 10, 2026
DOCKET	1:23-cv-01680-TWP-TAB
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff brought Fourteenth Amendment failure-to-protect claims under 42 U.S.C. § 1983 against county jail officials. After discovery, defendants filed a renewed motion for summary judgment.
STANDARD OF REVIEW	Summary judgment is proper when there is no genuine dispute of material fact and the movant is entitled to judgment as a matter of law. The court viewed the evidence and drew reasonable inferences in favor of the nonmovant, could not weigh evidence or make credibility determinations, and treated reliable video evidence as controlling where it blatantly contradicted a party's account so that no reasonable jury could credit that account.
PRECEDENTIAL VALUE	Unpublished federal district court order; generally nonprecedential outside the case.

PARTIES

William Scott Sloan v. Sheriff Dwayne Burgess, Major Rhinehart, Lt. C. Kakavecos, Deputy Vandagriff, Sgt. Kendal

TOPICS

summary judgment prisoners rights section 1983 fourteenth amendment evidence

PRACTICE AREAS

civil rights litigation prisoner and detainee litigation federal civil procedure constitutional torts
evidence and spoliation

QUESTIONS PRESENTED

1. Whether defendants were entitled to summary judgment on Sloan's Fourteenth Amendment failure-to-protect claims because Sloan could not establish causation.
2. Whether the preserved video evidence conclusively contradicted Sloan's account of the altercation and established that his own conduct caused the injuries.
3. Whether the failure to preserve additional surveillance footage warranted spoliation sanctions.
4. Whether portions of a defendant's declaration containing statements by nonparties should be excluded as hearsay.

HOLDINGS

1. Even assuming that one or more defendants acted objectively unreasonably regarding a risk to Sloan, summary judgment was proper because no reasonable jury could find that defendants caused Sloan's injuries. Sloan's voluntary decision to confront Lewis was an unforeseeable superseding cause that severed defendants' liability.
2. The claim requires an intentional decision concerning the conditions of confinement, conditions creating a substantial risk of serious harm, failure to take reasonable available measures that a reasonable officer would have appreciated were necessary, and causation of injury. Unlike an Eighth Amendment claim, the detainee need not prove subjective awareness of the substantial risk, but negligence is insufficient.
3. Spoliation sanctions were inappropriate because Sloan did not show that defendants had a duty to preserve the additional footage or that it was destroyed in bad faith.

KEY QUOTATIONS

"[W]here a reliable videotape clearly captures an event in dispute and blatantly contradicts one party's version of the event so that no reasonable jury could credit that party's story, a court should not adopt that party's version of the facts for the purpose of ruling on a motion for summary judgment." (at 7)

"A successful § 1983 plaintiff therefore must establish not only that a state actor violated his constitutional rights, but also that the violation caused the plaintiff injury or damages." (at 8)

“The plaintiff’s “deliberate choice to approach” the other inmate “was an unforeseeable superseding cause of his injury” that severed the official’s liability.” (at 9)

FACTUAL BACKGROUND

Sloan was a pretrial detainee at the Johnson County Jail when he was assaulted by fellow detainee Marthan Lewis on February 1, 2022, sustaining a broken jaw, broken nose, and perforated eardrum. Sloan alleged that jail officials knew Lewis posed a danger and failed to protect him. The record showed that Sloan voluntarily approached Lewis in a cell area and engaged him in a heated dispute about which television program would be shown; preserved video showed Sloan repeatedly confronting Lewis before Lewis punched him. Sloan had submitted a prior complaint concerning another inmate’s disruptive and racist behavior, but he admitted that he had not given jail personnel written notice before the incident that Lewis posed a specific threat to him.

PROCEDURAL HISTORY

Sloan filed the complaint on September 11, 2023, and the court allowed him to proceed on Fourteenth Amendment failure-to-protect claims against five jail officials. The court granted Sloan’s Rule 56(d) motion, permitted him to withdraw prior deemed admissions under Rule 36(b), and allowed new admissions responses. Defendants then filed a renewed motion for summary judgment, which Sloan opposed. The court denied the original summary-judgment motion as moot and granted the renewed motion; final judgment was to issue separately.

DISPOSITION

other

CASES CITED

- *Khungar v. Access Community Health Network*, 985 F.3d 565, 572-73 (7th Cir. 2021)
- *Miller v. Gonzalez*, 761 F.3d 822, 827 (7th Cir. 2014)
- *Grant v. Trustees of Indiana University*, 870 F.3d 562, 573-74 (7th Cir. 2017)
- *Celotex Corp. v. Catrett*, 477 U.S. 317, 323 (1986)
- *McCottrell v. White*, 933 F.3d 651, 661 n.9 (7th Cir. 2019)
- *Roca Labs, Inc. v. Consumer Opinion Corp.*, 140 F. Supp. 3d 1311, 1316-17 (M.D. Fla. 2015)
- *Trask-Morton v. Motel 6 Operating L.P.*, 534 F.3d 672, 681 (7th Cir. 2008)
- *Mathis v. John Morenden Buick, Inc.*, 136 F.3d 1153, 1155 (7th Cir. 1998)
- *Park v. City of Chicago*, 297 F.3d 606, 615 (7th Cir. 2002)
- *Bracey v. Grondin*, 712 F.3d 1012, 1019 (7th Cir. 2013)
- *Farmer v. Brennan*, 511 U.S. 825, 833 (1994)
- *Kemp v. Fulton County*, 27 F.4th 491, 496 (7th Cir. 2022)
- *Castro v. County of Los Angeles*, 833 F.3d 1060, 1071 (9th Cir. 2016)
- *Roe v. Elyea*, 631 F.3d 843, 863-64 (7th Cir. 2011)

- Heck v. Humphrey, 512 U.S. 477, 483 (1994)
- Whitlock v. Brueggemann, 682 F.3d 567, 582-83 (7th Cir. 2012)
- Hunter v. Mueske, 73 F.4th 561, 568-69 (7th Cir. 2023)
- Santiago v. Walls, 599 F.3d 749, 759 (7th Cir. 2010)
- Johnson v. Johnson, 2025 WL 2324264, at *5 (N.D. Ill. Aug. 12, 2025)
- Reed v. Black, 2024 WL 216674, at *2-3 (N.D. Ill. Jan. 19, 2024)
- Gueller v. Shawano County, 2022 WL 993532, at *4 (E.D. Wis. Apr. 1, 2022)
- Lemmons v. Durant, 2011 WL 4633104, at *4 (C.D. Ill. Oct. 4, 2011)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/federal/united-states-district-court-for-the-southern-district-of-in/2026/william-scott-sloan-v-sheriff-dwayne-burgess-et-al-wc581wj5>