

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
ILLINOIS

Corey Williams v. Jeremiah Brown, Sergeant Belcher, Jane Doe
Fitzgerald, and John Doe #s 1-11

Williams v. Brown · No. 26-cv-196-NJR · Decided May 1, 2026

SUMMARY

The United States District Court for the Southern District of Illinois conducted preliminary screening under 28 U.S.C. § 1915A of Corey Williams’s prisoner civil rights complaint arising from an alleged use of excessive force at Lawrence Correctional Center. The court allowed Eighth Amendment excessive-force and Illinois assault-and-battery claims to proceed against John Doe Officers 1–7, and a deliberate-indifference-to-medical-needs claim to proceed against John Doe Officers 2–6 and 8. Claims against Jeremiah Brown, Sergeant Belcher, Counselor Fitzgerald, John Does 9–11, and unspecified officers were dismissed without prejudice; Brown was added in his official capacity solely to facilitate discovery identifying the John Doe defendants.

CASE DETAILS

COURT	United States District Court for the Southern District of Illinois
WRITING FOR THE COURT	Nancy J. Rosenstengel
JURISDICTION	United States District Court for the Southern District of Illinois
DECIDED	May 1, 2026
DOCKET	26-cv-196-NJR
DISPOSITION	other
PROCEDURAL POSTURE	Preliminary screening of a prisoner civil-rights complaint under 28 U.S.C. § 1915A.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915A, the court must dismiss any portion of a prisoner complaint that is frivolous, malicious, fails to state a claim upon which relief may be granted, or seeks damages from an immune defendant. The complaint must plead enough facts to state a claim that is plausible on its face.
PRECEDENTIAL VALUE	Unknown; district-court memorandum and order with no reporter citation.

PARTIES

Corey Williams v. Jeremiah Brown, Sergeant Belcher, Jane Doe
Fitzgerald, John Doe #s 1-11

TOPICS

section 1983 prisoners rights police misconduct civil procedure torts

PRACTICE AREAS

Prisoner civil rights Civil procedure Torts

QUESTIONS PRESENTED

1. Whether the complaint plausibly stated an Eighth Amendment excessive-force claim against John Doe officers 1 through 7.
2. Whether the complaint plausibly stated Illinois assault and battery claims arising from the same alleged use of force.
3. Whether the complaint plausibly stated an Eighth Amendment deliberate-indifference-to-medical-needs claim against John Doe officers 2 through 6 and 8.
4. Whether the claims against unidentified officers, John Does 9 through 11, Counselor Fitzgerald, and Sergeant Belcher were sufficiently pleaded to proceed.
5. Whether the current warden could be added in his official capacity solely to facilitate discovery identifying the John Doe defendants.

HOLDINGS

1. The complaint plausibly stated an Eighth Amendment excessive-force claim against John Doe officers 1 through 7, so Count 1 could proceed.
2. The complaint plausibly stated Illinois assault and battery claims against John Doe officers 1 through 7, and those claims could proceed as Count 2.
3. The complaint plausibly stated an Eighth Amendment deliberate-indifference claim against John Doe officers 2 through 6 and 8 for failing to obtain medical care, so Count 3 could proceed.
4. Claims against additional unidentified officers, John Does 9 through 11, Counselor Fitzgerald, and Sergeant Belcher were dismissed without prejudice because the complaint did not sufficiently connect those defendants to a constitutional violation.

KEY QUOTATIONS

“Correctional officers violate the Eighth Amendment when they use force not ‘in a good faith effort to maintain or restore discipline,’ but ‘maliciously and sadistically for the very purpose of causing harm.’” (at 11)

“an action fails to state a claim upon which relief can be granted if it does not plead “enough facts to state a claim to relief that is plausible on its face”.” (at 11)

FACTUAL BACKGROUND

Williams alleged that correctional officers responded to a purported staff-assault alert after he attempted to speak with a counselor and had already gotten on the ground with his hands behind his back. He alleged that John Doe officers used mace, punches, kicks, restraints, racial slurs, and attempted drowning, and that officers later beat him when he requested medical care. Williams claimed cuts, contusions, a fractured orbital floor requiring surgery, vision problems, numbness, and headaches.

PROCEDURAL HISTORY

Williams filed a pro se complaint under 42 U.S.C. § 1983 alleging excessive force, failure to intervene, and deliberate indifference to medical needs arising from an incident at Lawrence Correctional Center. The court screened the complaint under § 1915A, dismissed inadequately pleaded claims and defendants without prejudice, allowed specified federal and state-law claims to proceed against identified John Doe defendants, and added the current warden in his official capacity solely to facilitate discovery identifying the Doe defendants.

DISPOSITION

other

CASES CITED

- Wilborn v. Ealey, 881 F.3d 998, 1006 (7th Cir. 2018)
- Hudson v. McMillian, 503 U.S. 1, 6 (1992)
- Shea v. Winnebago County Sheriff's Department, No. 17-3078, 746 F. App'x 541, 548 (7th Cir. Aug. 16, 2018)
- Wisconsin v. Ho-Chunk Nation, 512 F.3d 921, 936 (7th Cir. 2008)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 570 (2007)