

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MISSOURI, EASTERN DIVISION

White v. Alexander

White v. Alexander · No. 4:25-cv-00031-MTS · Decided March 11, 2026

SUMMARY

The court grants the moving defendants’ motion to dismiss an amended 42 U.S.C. § 1983 complaint alleging unconstitutional conditions of confinement at the St. Louis City Justice Center. The court holds that the complaint improperly relies on group pleading and fails to allege facts showing that any specific defendant had actual knowledge of and disregarded the alleged conditions. Plaintiffs are granted leave to file a second amended complaint by April 24, 2026.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Eastern Division
WRITING FOR THE COURT	Matthew T. Schelp
JURISDICTION	United States District Court for the Eastern District of Missouri, Eastern Division
DECIDED	March 11, 2026
DOCKET	4:25-cv-00031-MTS
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiffs brought a 42 U.S.C. § 1983 action alleging unconstitutional conditions of confinement. After the court dismissed the original complaint against the City of St. Louis with leave to amend, the City employees named in the First Amended Complaint moved to dismiss for improper group pleading and failure to allege each defendant's personal involvement.
STANDARD OF REVIEW	Whether the Amended Complaint plausibly pleaded a § 1983 claim against each individual defendant under the applicable motion-to-dismiss standard.
PRECEDENTIAL VALUE	unpublished district court opinion; precedential status unknown
PARTIES	Willie B. White, Matthew Lawler v. Direll Alexander, Bruce Borders, Raymond Brown, Nicole Burt, Matthew Caldwell, Lorenzo Chapman, Lenita Cherry, Pamela Clark, Renee Cooper, Stephan Demerath,

Marilyn Earvin, Christopher Ensign, Ann Flint, Javan Fowkles, Tonya Harry, Pamela Hemphill, Ronnie Johnson, LeRonald Loper, Anita Nolan, Nachante Ursery, Frederick Watson, LeeRoy Wilborn, Anthony Williams, Keith Williams

TOPICS

motions to dismiss pleadings section 1983 prisoners rights civil rights

PRACTICE AREAS

civil procedure civil rights constitutional law prisoner civil rights municipal liability

QUESTIONS PRESENTED

1. Whether the First Amended Complaint plausibly stated an Eighth Amendment conditions-of-confinement claim against each individual defendant.
2. Whether plaintiffs could establish individual liability under 42 U.S.C. § 1983 through allegations that collectively attributed knowledge and conduct to defendants who were on duty at some point during the eleven-day period.
3. Whether plaintiffs should be granted leave to file a further amended complaint after dismissal based on group pleading.

HOLDINGS

1. The First Amended Complaint failed to state a plausible § 1983 claim because it did not allege facts tying any specific defendant to the alleged conduct or showing that any particular defendant knew of and disregarded the asserted risk to plaintiffs' health or safety.
2. Alleging that defendants were on duty at some point during the relevant period, without identifying their individual knowledge or conduct, does not establish deliberate indifference under the Eighth Amendment.
3. The court granted the motion to dismiss with leave for plaintiffs to file a Second Amended Complaint alleging facts against specific defendants.

KEY QUOTATIONS

“Thus, “a plaintiff must plead that each Government-official defendant, through the official’s own individual actions, has violated the Constitution.””

“Plaintiffs therefore needed to allege “facts that demonstrate what each defendant did to violate” the Eighth Amendment.”

“Because of Plaintiffs’ exclusive use of group pleading, they have not shown that any particular Defendant had actual knowledge of the squalid conditions Plaintiffs faced and disregarded it.”

FACTUAL BACKGROUND

Plaintiffs alleged that, while awaiting trial, they were held for eleven days in an overcrowded St. Louis City Justice Center cell without a working toilet. They alleged that the cell contained a pool of urine, feces, and vomit, that they slept on mats in the waste, and that they were required to eat meals passed through a slot covered in filth. In the First Amended Complaint, plaintiffs named twenty-seven employees who had been on duty at some point during the relevant period, but attributed the alleged conduct only collectively and did not plead facts connecting specific conduct or knowledge to specific defendants.

PROCEDURAL HISTORY

Plaintiffs initially sued the City of St. Louis and eight unnamed employees under § 1983. The court dismissed the claims against the City for failure to plead facts establishing municipal liability but granted leave to amend. Plaintiffs filed a First Amended Complaint naming twenty-seven individual employees, who moved to dismiss. The court granted the motion but allowed plaintiffs to file a Second Amended Complaint by April 24, 2026, or elect to stand on the First Amended Complaint, in which event the action would be dismissed.

DISPOSITION

other

CASES CITED

- Monell v. Department of Social Services of the City of New York, 436 U.S. 658 (1978)
- Romero v. City of Lansing, 159 F.4th 1002, 1015 (6th Cir. 2025)
- Ashcroft v. Iqbal, 556 U.S. 662, 676 (2009)
- Cahoo v. SAS Analytics Inc., 912 F.3d 887, 899 (6th Cir. 2019)
- Farmer v. Brennan, 511 U.S. 825, 837 (1994)
- Burnette v. Taylor, 533 F.3d 1325, 1331 (11th Cir. 2008)
- Simmons v. Cook, 154 F.3d 805, 807 (8th Cir. 1998)
- Jensen v. Clarke, 94 F.3d 1191, 1195 (8th Cir. 1996)
- Laswell v. Brown, 683 F.2d 261, 268 (8th Cir. 1982)
- Roberts v. Dillon, 15 F.3d 113, 115 (8th Cir. 1994) (per curiam)
- Smith v. Copeland, 87 F.3d 265, 268 (8th Cir. 1996)
- Taylor v. Riojas, 592 U.S. 7, 13 (2020) (Alito, J., concurring in the judgment)
- Woods v. City of St. Louis, 4:24-cv-0868-MTS, 2025 WL 2096679, at *3 (E.D. Mo. July 25, 2025)
- Storm v. Warden, 2:25-cv-1483-AC, 2025 WL 1695034, at *3 (E.D. Cal. June 17, 2025)
- Partridge v. Dzurenda, 2:19-cv-1355-RFB, 2020 WL 4193470, at *3 (D. Nev. July 20, 2020)
- Missouri ex rel. Nixon v. Prudential Health Care Plan, Inc., 259 F.3d 949, 956 (8th Cir. 2001)
- Britt v. DeJoy, 45 F.4th 790, 797 (4th Cir. 2022) (en banc)

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