

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Louis Rodrigues v. Special Treatment Unit, et al.

Rodrigues · No. 2:19-cv-14708 (MCA) · Decided January 13, 2026

SUMMARY

The United States District Court for the District of New Jersey denies Plaintiff Louis Rodrigues’s motion for sanctions concerning the filing of medical information and administratively terminates his cross-motion for summary judgment. The Court treats the cross-motion as a response to Defendants’ supplemental summary judgment briefing and states that it will resolve the summary judgment motions by separate opinion and order. The case concerns claims under 42 U.S.C. § 1983 and the New Jersey Civil Rights Act involving alleged denial of religious services and chaplain visits.

CASE DETAILS

COURT	United States District Court for the District of New Jersey
WRITING FOR THE COURT	Madeline Cox Arleo
JURISDICTION	United States District Court for the District of New Jersey
DECIDED	January 13, 2026
DOCKET	2:19-cv-14708 (MCA)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff filed a purported cross-motion for summary judgment and a motion for sanctions while defendants' summary judgment motions were pending. The court treated the purported cross-motion as a response to defendants' supplemental summary judgment briefing, denied sanctions, and administratively terminated the cross-motion for docket-management purposes.
PRECEDENTIAL VALUE	Unknown

TOPICS

- sanctions
- summary judgment
- prisoners rights
- section 1983
- civil procedure

PRACTICE AREAS

- civil procedure
- prisoner civil rights
- religious exercise
- sanctions

QUESTIONS PRESENTED

1. Whether plaintiff's purported cross-motion for summary judgment should be accepted as filed despite the absence of leave to file such a motion.
2. Whether defendants should be sanctioned for filing plaintiff's personal medical information.
3. Whether the purported cross-motion should be considered as plaintiff's response to defendants' supplemental summary judgment motions.

HOLDINGS

1. Sanctions were not warranted because the medical report plaintiff identified had in fact been filed under seal and was accessible only to the court and the parties.
2. The court administratively terminated plaintiff's purported cross-motion for docket-management purposes and treated it as a response to defendants' supplemental summary judgment briefing.

KEY QUOTATIONS

“The Court also denies Plaintiff’s motion for sanctions in connection with the filing of his personal medical information without his permission.”

“The Court will reactivate and resolve the summary judgment motions by separate opinion and order in due course.”

FACTUAL BACKGROUND

Plaintiff alleged that defendants completely denied him religious services and chaplain visits on the South Unit while preventing him from attending services in the Annex with the general population. He also sought sanctions based on defendants' filing of a 23-page medical report without his authorization. The court found that the medical report had been filed under seal and was available only to the court and parties.

PROCEDURAL HISTORY

Defendants previously moved for summary judgment on plaintiff's religious-exercise claims under 42 U.S.C. § 1983 and the New Jersey Civil Rights Act. The court terminated those motions and ordered supplemental factual and legal submissions, giving plaintiff leave to respond. Plaintiff instead filed a purported cross-motion for summary judgment and sanctions. The court administratively terminated the cross-motion, treated it as plaintiff's permitted response, and deferred resolution of the summary judgment motions to a separate opinion and order.

DISPOSITION

other

CASES CITED

- Turner v. Safley, 482 U.S. 78 (1987)

OPINION

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY LOUIS RODRIGUES, Civil Action No. 19-14708 (MCA) Plaintiff, MEMORANDUM & ORDER v. SPECIAL TREATMENT UNIT, et al., Defendants. This matter comes before the Court on Plaintiff's cross-motion for summary judgment motion for sanctions. (ECF No. 203.) By way of background, retired STU director Merrill Main and Department of Corrections administrators Crystal Raupp and Marc Sims ("DOC Defendants") separately sought summary judgment in this matter.

(ECF No. 182, 183.) The Court terminated those summary judgment motions and required both sets of Defendants to supplemental their Statement of Material Facts, legal arguments, and evidence regarding Plaintiff's religious exercise claim, which he raised under 42 U.S.C. § 1983 and the New Jersey Civil Rights Act ("NJCR"). (ECF No. 191.)

The Court also provided Plaintiff with the opportunity to respond to the supplemental briefing and administratively terminated this matter pending the completion of the supplemental briefing. After two extensions of time (ECF Nos. 193-196), Defendants filed their supplemental briefing. (ECF Nos. 197-201.)

In granting those extensions of time, the Magistrate Judge, like this Court, provided Plaintiff with leave to file a response to the supplemental briefing. (ECF Nos. 193, 196.) Neither this Court nor the Magistrate Judge provided Plaintiff with leave to file a cross-motion for summary judgment.¹ Plaintiff, however, in lieu of a response, filed what he characterizes as a cross motion for summary judgment and for sanctions.

(ECF No. 203.) Defendants have opposed the cross-motion for summary judgment and motion for sanctions. (ECF Nos. 208-213.) At this time, the Court will administratively terminate the cross-motion for summary judgment and consider it as a response to Defendants' motions for summary judgment, which Plaintiff was provided leave to file.² The Court will reactivate and resolve the summary judgment motions by separate opinion and order in due course.

The Court also denies Plaintiff's motion for sanctions in connection with the filing of his personal medical information without his permission. Plaintiff alleges that a 23-page medical record was submitted without his authorization and should have been filed under seal. (See ECF No. 203, at 13). He appears to refer Dr. Roger Harris's 23-page October 2021 report, filed at ECF No. 199 as Exhibit D. This document was in fact filed under seal and is only available to the Court and the parties.

Therefore, there is no basis to sanction the DOC Defendants in connection with this filing, and the motion for sanctions is denied on this basis. To the extent the Court must refer with specificity to any of Plaintiff's personal medical information in resolving the motions for summary judgments, it will redact that private medical information from its opinion.

IT IS, THEREFORE, on this 12th day of January 2026, 1 As the basis for his cross-motion for summary judgment, Plaintiff principally argues 1) that the Court should not rely on *Turner v. Safley*, 482 U.S. 78 (1987) to resolve his religious exercise claim, 2) that analysis of the Turner factors weigh in his favor, and 3) that he is entitled to judgment as a matter of law on his claim that Defendants have completely denied him religious services and chaplain visits on the South Unit while simultaneously refusing to permit him to attend religious services in the Annex with the general population.

2 Although Plaintiff was not provided leave to submit a cross-motion for summary judgment at this late date, the Court will consider whether he is entitled to judgment as a matter of law on his claim of complete denial of religious services in the South Unit. ORDERED that Plaintiff's motion for sanctions (ECF No. 203) is DENIED; and it is further ORDERED that the Clerk of the Court shall ADMINISTRATIVELY TERMINATE Plaintiff's cross-motion for summary judgment (ECF No. 203) for docket management purposes; the Court will reactivate and resolve the motions for summary judgment by separate opinion and order in due course.

Cr Madeline Cox Arleo, District Judge United States District Court