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Montanez v. Price

United States Court of Appeals, Third Circuit - October 8, 2025 - 154 F.4th 127

Inmate brought pro se action against Commonwealth, prison officials and medical personnel, private company contracted by Commonwealth to provide medical services in its prisons, and four employees of company, alleging under § 1983 that defendants were deliberately indifferent to his serious medical needs, and asserting claims under Title II of Americans with Disabilities Act (ADA) and Rehabilitation Act (RA).

The United States District Court for the Middle District of Pennsylvania granted defendants' motions to dismiss for failure to state claim and denied inmate's motion for leave to amend complaint. Inmate appealed.

The Court of Appeals held that:

- Inmate's spinal cord stenosis and edema, which caused paralysis requiring surgery, sudden incontinence, and herniated disc qualified as "serious medical needs," as supported § 1983 Eighth Amendment claim for inadequate medical care;
- Inmate stated § 1983 Eighth Amendment claims based on inadequate medical care and unsanitary conditions of confinement against physician who allegedly abandoned him in cell for three days while he was paralyzed and uncontrollably urinating on himself;
- Alleged actions of physician in denying inmate pain medication could not form basis of § 1983 Eighth Amendment claim based on inadequate medical care;
- Inmate failed to state § 1983 Eighth Amendment claim based on inadequate medical care against company;
- Neither officials nor employees were subject to suit in their personal capacities under Title II of ADA;
- Inmate stated claims for disability discrimination against Commonwealth and company under RA and Title II of ADA; and
- As matter of first impression, a state has obligation to ensure compliance with RA and Title II of ADA even when it contracts out operations of its programs, services, or activities to third parties.

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