

United States District Court for the Central District of Illinois  
Springfield Division

**FILED**

JUN 22 2023

Hammond, Plaintiff

CLERK OF THE COURT  
U.S. DISTRICT COURT  
CENTRAL DISTRICT OF ILLINOIS

v.

Case No. 3:23-cv-03058-JEM-KLM

McReynolds et al.  
Defendants.

Motion for Leave to File Amended Complaint

Now comes the pro se plaintiff and files this amended complaint pursuant to the Federal Rules of Civil Procedure.

1. The plaintiff is suing for deprivations of his civil rights against the defendants for violating his 14<sup>th</sup> Amendment Rights of Objective Reasonableness, where as the defendants were at all times during this complaint acting under the color of state law.
2. The plaintiff was booked into the Shelby County Detention Center / Sheriff's Dept on December 6<sup>th</sup> of 2022.
3. Shortly after his arrest, the plaintiff began having extreme pain in his side and stomach and complained regularly to the jail's medical staff.



4. The plaintiff suffered for three months before being seen by the jail's doctor and was denied emergency care on several occasions.
5. On February 27<sup>th</sup> or thereafter, the plaintiff was allowed to see the jail doctor about his side and stomach pain but still no laboratory testing or urinalysis was ordered by the jail physician.
6. On March 1<sup>st</sup> of 2023, after three months of suffering intense pain in his abdomen and side, the plaintiff was taken to the Emergency Room, against the jail doctor's recommendation.
7. At the Emergency Room on March 1<sup>st</sup> of 2023, the plaintiff was diagnosed by the E.R. physician to be suffering from a long-term intra-abdominal infection and elevated liver enzymes.
8. No diagnostic (laboratory testing or urinalysis) was ever done by the jail's medical staff to determine the source of the plaintiff's pain and it was only after being taken to the Emergency Room, after several denials by the jail's physician, that he was diagnosed with an intra-abdominal infection showing the defendant's violation of his 14<sup>th</sup> Amendment Right of Objective Reasonableness.
9. The plaintiff's suffering could've been easily avoided if



the defendants would've provided adequate healthcare and followed a standard of care that any reasonable physician would have given when diagnosing or treating a complaint.

10. The defendants are sued both in their individual and official capacities.
11. The defendants are sued jointly and severally.
12. The plaintiff seeks \$1,000,000 dollars in compensatory and punitive damages from each individual defendant for their acts in violating his 14<sup>th</sup> Amendment Right of Objective Reasonableness, and any monetary relief deemed fit.
13. Defendants to include Sheriff McReynolds for his acts in not practicing a policy or standard of Objective Reasonableness whereas he allowed the 14<sup>th</sup> Amendment violations to continue after being made aware of the injustice.
14. Defendants to include Doctor Duran who is employed or contracted by the Shelby County Sheriff's Department / Detention Center and participated directly in the violations of the plaintiff's 14<sup>th</sup> Amendment Rights of Objective Reasonableness.
15. Defendants to include Nurse Cathy Stephens who acted directly in the violations of the plaintiff's 14<sup>th</sup> Amendment Rights and is employed or contracted by the Shelby County



Sheriff's Department / Detention Center and was during the times of this complaint and works as Doctor Duran's nurse or did during the time of these said violations.

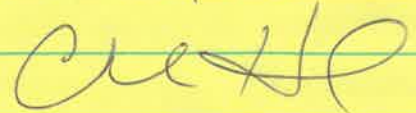
16. Defendants to include Advanced Correctional Healthcare who is the healthcare provider for the Shelby County Sheriff's Department / Detention Center and employs or contracts both Nurse Cathy Stephens and Dr. Duran and oversees their participation in the inmates of the Shelby County jails healthcare.
17. Defendants to include the Shelby County Sheriff's Department / Detention Center for its violations of the plaintiff's 14th Amendment Rights of Objective Reasonableness and for practicing policies that allow for the above-mentioned violations. All defendants work within the facility of the Shelby County Sheriff's Department / Detention Center and are liable for the healthcare of its inmates.
18. The plaintiff is providing a verification of his account of this complaint and provides it as supporting documentation to this amended complaint.

✓ I, Chad Hammond, declare under penalty of perjury that the aforementioned is true and correct. Executed on June 20<sup>th</sup> of 2023, in Shelbyville, TN.

The plaintiff prays that this honorable court freely allows this amended complaint to be filed pursuant to local rules and the Federal Rules of Civil Procedure.

in Shelbyville,  
Illinois.

Respectfully Submitted,



Chad R. Hammond  
151 N. Morgan  
Shelbyville, Ill. 62965