

SUMMARY STATEMENT

Williams v. Hollinshead

Docket No. 48053

This appeal concerns a group of prisoners (“Petitioners”) seeking a writ of habeas corpus based on the conditions of their confinement during the COVID-19 pandemic. The Petitioners are all incarcerated at the Elmore County Jail (“Jail”) in Idaho. They contend their conditions of confinement constitute cruel and unusual punishment in violation of the Eighth Amendment to the United States Constitution. More specifically, the Petitioners assert they are in imminent danger because officials at the Jail have not implemented any discernable mitigation measures in response to the COVID-19 pandemic. Elmore County Sheriff Mike Hollinshead and Lieutenant Shauna Gavin (collectively “Officials”) deny this assertion. Furthermore, the Officials contend the Petitioners’ request for a writ of habeas corpus should be denied because the Petitioners have not exhausted their administrative remedies. The Officials filed a motion for summary judgment with the district court, which was granted. The district court also awarded the Officials their attorney fees. The Petitioners timely appealed the district court’s decisions to the Idaho Supreme Court, which agreed to hear the appeal on an expedited basis.

The Idaho Supreme Court affirmed the district court’s decision granting summary judgment, but reversed the district court’s award of attorney fees. First, the Court held that the district court did not abuse its discretion when it denied the Petitioners’ motion for discovery. Next, the Court held that the district court did not err when it granted summary judgment in favor of the Officials because (1) the Petitioners did not exhaust their administrative remedies and (2) there is no genuine issue of material fact as to whether the Officials’ actions constitute deliberate indifference or the imposition of punishment. Next, the Court held that the district court did not err when it refused to consider the Petitioners’ due process claims, which were raised for the first time after the Officials had moved for summary judgment. Finally, the Court held that the district court erred when it awarded attorney fees to the Officials. Consequently, the Court reversed the district court’s award of attorney fees.

This summary constitutes no part of the opinion of the Court, but has been prepared by court staff for the convenience of the public.