

SUPREME COURT OF THE UNITED STATES
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Michael L. Boyd

PLAINTIFF

vs.

Case No. 24-6832

Dexter Payne, Director
Arkansas Division of Correction, et al

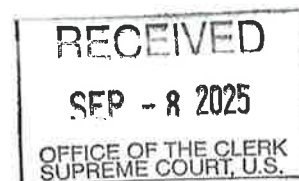
DEFENDANT

MOTION FOR
REHEARING

Petitioner Michael L. Boyd arrived at East Arkansas Regional Unit in 2014. In 2016 Petitioner was exposed to ulcerative colitis through the water. On top of that disease on August, 2019 specialist Dr. Samuel, M.D. diagnosed Petitioner with salmonella and e-coli, and as of January 23, 2025 those diseases have lead to moderate crohn disease. Petitioner had to have a 3 stage operation.

STATEMENT OF CLAIM

Defendants APN Bennett and nurse Douglas. Comes now on August 8, 2022 Inmate M. Boyd ADC# 115890 discharge from St. Vincent Medical Center pertaining to the 2nd surgery. Upon arrival to East Arkansas Regional Unit medical staff Nurse Davis and Douglas indicated I was not allowed to have the ileostomy supplies that APN Bennett authorized it. - see Farmer v. Brennan 54 US 832, 1994. Defendants took supplies that the hospital and surgeon order for me to have because the ostomy pouch is a combination with the supplies that stop leaks. Like items ostomy powder, paste, and barrier rinses that stop leaks. Defendants disregarded those needs.



see *Crow v. Montgomery* 403 F3d 598, 602 8th Cir. 2005 and *Estelle* 429 U.S. at 103, 97 Sct 285. Plaintiff was discharge from having 2nd surgery August 8, 2022. Plaintiff had to walk around with irritation and pain for over a month until 9-14-2022 was seen by surgeon Szeto 9-14-2022. see exhibit 1. Plaintiff request for video tape to be pull.

Defendants APN Bennett and nurse Douglas intentionally deliberately denies Plaintiff treatment supplies the most important supplies item the barrier rings that stop leaks, see Exhibit -7, this was a surgeon ordered *Estelle v. Gamble*, 429 US 97, 104-05, 1976. Come now on 8-24-2022 Plaintiff was call to medical to be put on the ward to treat irritated skin around the stovis. APN Bennett authorized no ostomy appliances to be given to me. No toilet paper. The only thing plaintiff had unlock room medication zinc oxide issue 10-4x4 to clean/catch feces. Plaintiff had to use his clothes to clean up with. This went on for two days, see grievance attachment VI grievance #EA-22-00538 as exhibit -2. Comes now to walk around with my intestine in my hand. This is a sufficiently substantial risk of serious damage to his health. see *Helling* 509 US at 35, 113 Sct at 2481. witness pertaining to this issue with leaks from the J-pouch in 2022 and complications see affidavits's as exhibits -3 as of 2025. Comes now on September 4, 2022 plaintiff continue to have problems with the ostomy pouch wouldn't stay on because defendants denied treatment supplies, as of 8-4-2022. Plaintiff was call to sick call in was seen by nurse Mixon who indicated I could not have any ileostomy supplies nurse Mixon told me to get out. Defendant's acted with a sufficiently curable state of mind - see *Choate v. Lockhart*, 7 F3d 1370, 1373 8th Cir. 1993, also *Wilson v. Seiter* 501 US 294, 302-03 Ill Sct. 2321, 2326-27 115 Led 2d 271 1991. Plaintiff have showed defendants was deliberately indifferent to inmate's serious medical needs see *Chambers v. Brienstead*, 73 F3d 174, 175 8th Cir. 1995 all defendants new of and disregarded that need. see *Miller v. Schoenen* 75 F3d 1305 1308 8th Cir. 1996 also *Estelle v. Gamble* 429 US 97, 105 97 Sct 285, 291-92, 50 L.Ed 2d 251, 1976. *Farmer v. Brennan* 511 US 825, 837, 114 Sct 1970, 1978-79, 128 Led 2d 811, 1994.

Come now easily recognize the necessity for a doctor's attention *Camberos v. Brianstised* 73 F3d at 176 when its a delay in medical treatment constituted a constitutional deprivation the objective seriousness of the deprivation should also be measured by reference to the effect of delay in treatment *Crowley v. Hedgepett*, 109 F3d 500, 502, 8th Cir. 1997. Come now plaintiff had a serious medical need. Defendants had sufficient knowledge of plaintiff serious medical need. Plaintiff suffered actual health as a consequence of defendant's actions and conduct.

Coleman v. Rahits no. 4-9-cv-50260 1996. Whitnack v. Douglas County 16 F3d 954, 957, 8th Cir. 1994. Choate v. Lockhart 7 F3 1370, 1373 8t Cir 1993. For a human to walk around with your hand that is a objectively serious medical need. Miller v. Schoenen 75 F3d 1305, 1309 8th Cir. 1996.

Plaintiff pray that
This Honorable Court grant
Rrelief