

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MISSOURI, EASTERN DIVISION

John Lee Frost v. Richard Adams, et al.

Frost · No. 4:26-cv-00709-MAL · Decided May 19, 2026

SUMMARY

The United States District Court for the Eastern District of Missouri denied inmate John Lee Frost’s motion for a temporary restraining order. Frost sought medical evaluation and follow-up care after a hunger strike, protection from retaliation, and confidential access to counsel. The court concluded that Frost had not demonstrated a likelihood of irreparable harm sufficient to support temporary relief.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Eastern Division
WRITING FOR THE COURT	Maria A. Lanahan
JURISDICTION	United States District Court for the Eastern District of Missouri, Eastern Division
DECIDED	May 19, 2026
DOCKET	4:26-cv-00709-MAL
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for a temporary restraining order seeking medical evaluation and follow-up care, protection from retaliation, and confidential access to counsel while his civil-rights action remained pending.
STANDARD OF REVIEW	A temporary restraining order is evaluated under the same standard as a preliminary injunction. The court considers likelihood of success on the merits, likelihood of irreparable harm absent relief, the balance of equities, and the public interest. Failure to show irreparable harm independently warrants denial.
PRECEDENTIAL VALUE	Nonprecedential district-court memorandum and order; no precedential status stated.
PARTIES	John Lee Frost v. Richard Adams, et al.

TOPICS

injunctions

prisoners rights

section 1983

civil rights

civil procedure

PRACTICE AREAS

civil procedure

prisoner civil rights

constitutional law

injunctive relief

QUESTIONS PRESENTED

1. Whether Frost demonstrated a likelihood of irreparable harm sufficient to support a temporary restraining order requiring prompt medical evaluation and follow-up care.
2. Whether Frost demonstrated a likelihood of irreparable harm sufficient to support temporary relief against alleged retaliation, interference with the prison grievance process, and restrictions on confidential access to counsel.

HOLDINGS

1. A temporary restraining order is subject to the same four-factor standard as a preliminary injunction, including likelihood of success on the merits, likelihood of irreparable harm, the balance of equities, and the public interest.
2. Frost failed to demonstrate a likelihood of irreparable harm, and that failure independently required denial of the requested temporary restraining order.

KEY QUOTATIONS

““While no single factor is determinative, the probability of success factor is the most significant.””

““Failure to show irreparable harm is an independently sufficient ground upon which to deny a preliminary injunction.””

““To succeed in demonstrating a threat of irreparable harm, ‘a party must show that the harm is certain and great and of such imminence that there is a clear and present need for equitable relief.’””

FACTUAL BACKGROUND

John Lee Frost, an inmate in the Missouri Department of Corrections, was placed in administrative segregation after being accused of masturbating to a female officer and later undertook a 32-day hunger strike. Frost alleged that prison officials failed to monitor and medically treat him adequately, retaliated against him, and interfered with his access to counsel and prison grievance procedures. The defendants asserted that Frost received medical care, was moved to an infirmary, and sometimes refused treatment; medical records showed that he later had regained some weight and that a physician found no significant abnormality requiring immediate care.

PROCEDURAL HISTORY

Frost filed a § 1983 complaint and moved for a temporary restraining order and preliminary injunction. After considering the parties' submissions and a hearing, the district court denied the motion because Frost failed to demonstrate a likelihood of irreparable harm.

DISPOSITION

other

CASES CITED

- Dataphase Sys., Inc. v. C L Sys., Inc., 640 F.2d 109, 113 n.5, 114 (8th Cir. 1981) (en banc)
- Tumey v. Mycroft AI, Inc., 27 F.4th 657, 665 (8th Cir. 2022)
- Winter v. Nat. Res. Def. Council, Inc., 555 U.S. 7, 20 (2008)
- Home Instead, Inc. v. Florance, 721 F.3d 494, 497 (8th Cir. 2013)
- Gen. Motors Corp. v. Harry Brown's, LLC, 563 F.3d 312, 318–19 (8th Cir. 2009)
- Watkins Inc. v. Lewis, 346 F.3d 841, 844 (8th Cir. 2003)
- Roudachevski v. All-Am. Care Centers, Inc., 648 F.3d 701, 706 (8th Cir. 2011)
- Iowa Utils. Bd. v. Fed. Commc'ns Comm'n, 109 F.3d 418, 425 (8th Cir. 1996)
- Porter v. Sturm, 781 F.3d 448, 452 (8th Cir. 2015)

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