

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
LOUISIANA, ALEXANDRIA DIVISION

William C. Huddleston v. Shannon Constantine, et al.

Civil Case No. 22-2105 (W.D. La. Feb. 2, 2026) · No. 1:22-cv-02105 · Decided February 2, 2026

SUMMARY

The United States District Court for the Western District of Louisiana granted two motions for summary judgment in William C. Huddleston’s action arising from his brief detention during an investigation of a carjacking. The court held that the Rapides Parish Sheriff’s Office and Alexandria Police Department were not juridical entities capable of being sued, rejected the Fourteenth Amendment claims, and analyzed the Fourth Amendment detention, qualified immunity, and evidentiary issues.

CASE DETAILS

COURT	United States District Court for the Western District of Louisiana, Alexandria Division
WRITING FOR THE COURT	Jerry Edwards, Jr.
JURISDICTION	United States District Court for the Western District of Louisiana, Alexandria Division
DECIDED	February 2, 2026
DOCKET	1:22-cv-02105
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff brought federal civil-rights claims under 42 U.S.C. § 1983 and related Louisiana-law claims arising from a brief law-enforcement detention, alleged false arrest, and alleged excessive force. Defendants moved for summary judgment, and the court granted both motions.
STANDARD OF REVIEW	Summary judgment is appropriate when there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The court viewed the evidence and reasonable inferences in the light most favorable to the nonmovant, without weighing evidence or making credibility determinations. For qualified immunity, the plaintiff had to show both a constitutional violation and violation of a clearly established right.
PRECEDENTIAL VALUE	unpublished district-court decision; persuasive only

PARTIES

William C. Huddleston v. Shannon Constantine, Matt Cloud, Mark Baden, Billy Fuller, Mark Wood, City of Alexandria, Alexandria Police Department, Ronney Howard

TOPICS

summary judgment

qualified immunity

section 1983

police misconduct

civil rights

PRACTICE AREAS

civil rights

constitutional law

police misconduct

torts

civil procedure

QUESTIONS PRESENTED

1. Whether the brief detention, use of handcuffs, and related police conduct constituted an arrest requiring probable cause or instead an investigative detention under Terry.
2. Whether Deputy Cloud had reasonable suspicion to initiate the stop based on the BOLO and whether Officer Constantine and the other officers had reasonable suspicion to detain Huddleston.
3. Whether the officers were entitled to qualified immunity on the unlawful-seizure, unlawful-detention, and excessive-force claims.
4. Whether the Alexandria Police Department and Rapides Parish Sheriff's Office were juridical persons capable of being sued under Louisiana law.
5. Whether Huddleston established equal-protection, substantive-due-process, Sixth Amendment, Monell, negligent hiring or supervision, and vicarious-liability claims.
6. Whether Huddleston's state-law claims survived summary judgment.

HOLDINGS

1. The approximately four-to-five-minute detention, including the officers' display of force, commands, and use of handcuffs, was an investigative detention under Terry rather than an arrest requiring probable cause.
2. Deputy Cloud had reasonable suspicion to conduct a Terry stop based on the BOLO identifying the stolen vehicle by make, model, color, and license plate and concerning a recent carjacking.
3. The officers had reasonable suspicion to detain Huddleston while they investigated whether his vehicle was the stolen Ridgeline and whether he posed an armed threat.
4. The officers were entitled to qualified immunity because Huddleston failed to establish a constitutional violation and failed to identify clearly established precedent placing the legality of the conduct beyond debate.
5. Double-cuffing Huddleston during the brief investigative detention was not clearly excessive or clearly unreasonable force, and Officer Constantine and Deputy Fuller were entitled to qualified immunity.
6. The Rapides Parish Sheriff's Office and Alexandria Police Department were not juridical persons capable of being sued under Louisiana law, so summary judgment was proper on claims against them.

7. The equal-protection, substantive-due-process, and Sixth Amendment claims failed as a matter of law and were dismissed.
8. The Monell claims failed because Huddleston did not adequately plead or support an official policy or custom that caused a constitutional violation, and § 1983 does not impose respondeat-superior liability.
9. The Louisiana-law claims for false arrest, false imprisonment, excessive force, assault, battery, emotional distress, negligence, negligent hiring or supervision, and vicarious liability failed on the merits.

KEY QUOTATIONS

“Based on the parties’ arguments and the applicable Fifth Circuit case law, the Court finds that the seizure in this case was an investigative detention under Terry, and not an arrest.” (Section IV.c.1)

“IT IS FURTHER ORDERED that all of Plaintiff’s federal and state law claims are hereby DISMISSED WITH PREJUDICE.” (Section V)

FACTUAL BACKGROUND

Police investigated a reported carjacking involving a gray Honda Ridgeline, a specified license plate, and possible firearms. Several hours later, Deputy Cloud reported seeing a matching Ridgeline near Alexandria and reported that it appeared to have switched tags; officers converged on Huddleston’s vehicle, ordered him out, handcuffed him using two sets of handcuffs, and detained him for approximately four to five minutes. The vehicle was then determined not to be the stolen vehicle, and Huddleston was released. He claimed injuries and emotional distress and asserted federal and state claims based on the detention and handcuffing.

PROCEDURAL HISTORY

Huddleston filed suit on July 14, 2022, against the Rapides Parish Sheriff’s Office, its officers, the Alexandria Police Department, the City of Alexandria, and related officials. He voluntarily dismissed the Rapides Parish Police Jury before the summary-judgment motions. The court considered two defense motions for summary judgment, an evidentiary objection to a Kologik license-plate-search exhibit, and the parties’ supporting and opposing submissions, then granted summary judgment on all claims and dismissed them with prejudice.

DISPOSITION

dismissed

CASES CITED

- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248 (1986)
- Celotex Corp. v. Catrett, 477 U.S. 317, 323-24 (1986)
- Reeves v. Sanderson Plumbing Products, Inc., 530 U.S. 133, 150 (2000)
- Cozzo v. Tangipahoa Parish Council-President Government, 279 F.3d 273, 283 (5th Cir. 2002)
- Pearson v. Callahan, 555 U.S. 223, 231, 236 (2009)

- D.C. v. Wesby, 583 U.S. 48, 62-64 (2018)
- Graham v. Connor, 490 U.S. 386, 395-97 (1989)
- United States v. Mendenhall, 446 U.S. 544, 554 (1980)
- Smith v. Heap, 31 F.4th 905, 911 (5th Cir. 2022)
- United States v. Gonzalez, 190 F.3d 668, 672 (5th Cir. 1999)
- United States v. Rodriguez, 564 F.3d 735, 742 (5th Cir. 2009)
- United States v. Brigham, 382 F.3d 500, 506 (5th Cir. 2004)
- United States v. Arvizu, 534 U.S. 266, 273 (2002)
- United States v. Webster, 750 F.2d 307, 323 (5th Cir. 1984)
- Trammell v. Fruge, 868 F.3d 332, 339-40 (5th Cir. 2017)
- Glenn v. City of Tyler, 242 F.3d 307, 314 (5th Cir. 2001)
- Monell v. Department of Social Services, 436 U.S. 658, 691-94 (1978)
- Hines v. Quillivan, 982 F.3d 266, 272 (5th Cir. 2020)
- Devenpeck v. Alford, 543 U.S. 146, 155 (2004)
- Rothgery v. Gillespie County, Texas, 554 U.S. 191, 223 (2008)
- Harrison v. State Through Department of Public Safety and Corrections, 721 So. 2d 458, 462-63 (La. 1998)
- White v. Monsanto Co., 585 So. 2d 1205, 1209 (La. 1991)
- Mathieu v. Imperial Toy Corp., 646 So. 2d 318, 321 (La. 1994)
- Frank v. Parnell, No. 1:18-CV-00978, 2019 WL 2438685, at *9 (W.D. La. May 14, 2019)
- United States v. Diggs, No. 18 CR 185, 2020 WL 5878018, at *4 (N.D. Ill. Oct. 2, 2020), aff'd, 81 F.4th 755 (7th Cir. 2023)
- Cross Trailers, Inc. v. Cross Trailer Manufacturing & Sales, LLC, 363 F. Supp. 3d 774, 786 (W.D. Tex. 2018)