

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
ARKANSAS, NORTHERN DIVISION

Paul Ian Carey v. Amanda Murphy

No. 3:25-cv-273-DPM-ERE (E.D. Ark. Dec. 29, 2025) · No. No. 3:25-cv-273-DPM-ERE · Decided December 29, 2025

SUMMARY

The United States District Court for the Eastern District of Arkansas grants Paul Ian Carey leave to proceed in forma pauperis and assesses an initial partial filing-fee payment. The Court identifies deficiencies in his § 1983 claims concerning diabetic treatment and gives him thirty days to file an amended complaint clarifying the alleged conduct, injury, and basis for official-capacity liability.

CASE DETAILS

COURT	United States District Court for the Eastern District of Arkansas, Northern Division
JURISDICTION	United States District Court for the Eastern District of Arkansas
DECIDED	December 29, 2025
DOCKET	No. 3:25-cv-273-DPM-ERE
DISPOSITION	other
PROCEDURAL POSTURE	A pro se inmate brought a 42 U.S.C. § 1983 action against a correctional officer, seeking monetary and injunctive relief. The court granted leave to proceed in forma pauperis, identified pleading deficiencies, postponed statutory screening, and granted leave to amend.
STANDARD OF REVIEW	At screening under 28 U.S.C. § 1915A, the court must accept factual allegations as true and may consider documents attached to the complaint; dismissal is required for claims that are frivolous or malicious, fail to state a claim, or seek monetary relief from an immune defendant.
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	Paul Ian Carey v. Amanda Murphy

TOPICS

- section 1983
- prisoners rights
- civil rights
- motion to amend
- civil procedure

PRACTICE AREAS

prisoner civil rights

civil procedure

constitutional torts

medical deliberate indifference

municipal liability

QUESTIONS PRESENTED

1. Whether Carey qualified to proceed in forma pauperis.
2. Whether the complaint pleaded sufficient facts to state a plausible medical deliberate-indifference claim against Murphy.
3. Whether the official-capacity claim against Murphy plausibly alleged that a Sharp County policy, custom, or practice caused a constitutional deprivation.
4. Whether Carey should be permitted to amend the complaint before the court conducted statutory prisoner screening.

HOLDINGS

1. Carey qualified to proceed in forma pauperis, and the court granted his IFP motion subject to an initial partial payment and collection of the balance of the filing fee.
2. To state a plausible medical deliberate-indifference claim, Carey must allege facts supporting a reasonable inference that he had an objectively serious medical need and that Murphy actually knew of but deliberately disregarded that need.
3. An official-capacity claim against Murphy is treated as a claim against Sharp County and requires allegations that a Sharp County policy, custom, or practice caused the constitutional deprivation; Carey failed to plead such allegations.
4. Carey was granted thirty days to file an amended complaint clarifying the factual basis for his claims; the amended complaint would supersede the original complaint and must stand alone.

KEY QUOTATIONS

“To state a plausible claim for medical deliberate indifference against Defendant Murphy, Mr. Carey must allege facts that, taken as true, support a reasonable inference that: (1) he had “objectively serious medical needs”; and (2) Defendant Murphy “actually knew of but deliberately disregarded those needs.””

“Sharp County cannot be held vicariously liable under § 1983 for the acts of its employees.”

“Mr. Carey’s amended complaint, if filed, will supersede or replace the current complaint.”

FACTUAL BACKGROUND

Paul Ian Carey, an inmate at the Sharp County Detention Center, alleged that he has type II diabetes. He claimed that Correctional Officer Amanda Murphy removed him from a diabetic menu and discontinued his blood-sugar testing. The complaint did not explain additional details about Murphy’s conduct or identify an injury caused by the alleged conduct, and it did not allege that a Sharp County policy, custom, or practice caused the deprivation.

PROCEDURAL HISTORY

Carey filed a prisoner civil-rights complaint and an application to proceed in forma pauperis. The court found that he qualified for IFP status but concluded that the complaint lacked sufficient factual allegations concerning the defendant's conduct, resulting injury, and the basis for official-capacity liability. The court allowed thirty days to file an amended complaint and stated that failure to amend would result in screening of the original complaint, likely leading to dismissal without prejudice of some claims.

DISPOSITION

other

CASES CITED

- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Reynolds v. Dormire, 636 F.3d 976, 979 (8th Cir. 2011)
- Hamner v. Burls, 937 F.3d 1171, 1177 (8th Cir. 2019)
- Saylor v. Nebraska, 812 F.3d 637, 644 (8th Cir. 2016)
- Laughlin v. Schriro, 430 F.3d 927, 929 (8th Cir. 2005)
- Roberson v. Bradshaw, 198 F.3d 645, 648 (8th Cir. 2001)
- Barton v. Taber, 908 F.3d 1119, 1124 (8th Cir. 2018)
- Roberts v. Kopel, 917 F.3d 1039, 1042 (8th Cir. 2019)
- Jenkins v. County of Hennepin, Minnesota, 557 F.3d 628, 633 (8th Cir. 2009)
- Parrish v. Ball, 594 F.3d 993, 997 (8th Cir. 2010)
- Jenkins v. County of Hennepin, Minnesota, 557 F.3d 628, 631-32 (8th Cir. 2009)
- Monell v. New York City Department of Social Services, 436 U.S. 658, 694-95 (1978)
- Brewington v. Keener, 902 F.3d 796, 801-02 (8th Cir. 2018)
- Corwin v. City of Independence, Missouri, 829 F.3d 695, 699-700 (8th Cir. 2016)
- In re Atlas Lines, Inc., 209 F.3d 1064, 1067 (8th Cir. 2000)