

UNITED STATES COURT OF APPEALS FOR THE EIGHTH CIRCUIT

Raymond Kelley v. Chad Pruett

No. 24-3084, United States Court of Appeals for the Eighth Circuit (January 8, 2026)

SUMMARY

The Eighth Circuit vacated and remanded a district court order denying qualified immunity to two Faulkner County Sheriff’s Office officers sued under 42 U.S.C. § 1983 for alleged excessive force. The court held that the district court identified disputed facts but did not construe them in the light most favorable to the plaintiff or analyze both prongs of qualified immunity. The dissent would have affirmed the denial of qualified immunity.

CASE DETAILS

COURT	United States Court of Appeals for the Eighth Circuit
WRITING FOR THE COURT	Shepherd, Circuit Judge; Smith, Circuit Judge; Gruender, Circuit Judge
JURISDICTION	United States Court of Appeals for the Eighth Circuit
DECIDED	January 8, 2026
DOCKET	24-3084
DISPOSITION	vacated
PROCEDURAL POSTURE	Interlocutory appeal from the denial of qualified immunity on an excessive-force claim under 42 U.S.C. § 1983.
STANDARD OF REVIEW	De novo review of a district court's qualified-immunity determination on summary judgment. The appellate court may review abstract legal issues relating to qualified immunity but generally lacks jurisdiction to review whether the pretrial record establishes a genuine issue of fact for trial.
PRECEDENTIAL VALUE	Published Eighth Circuit opinion
PARTIES	Chad Pruett, Sergeant, Badge No. F8, Faulkner County Sheriff's Office, Terry Roper, Deputy, Faulkner County Sheriff's Office v. Raymond Kelley

TOPICS

- qualified immunity
- section 1983
- police misconduct
- summary judgment
- interlocutory appeal

PRACTICE AREAS

Civil rights

constitutional law

qualified immunity

appellate procedure

civil procedure

QUESTIONS PRESENTED

1. Whether the district court properly denied qualified immunity on the individual-capacity excessive-force claim without construing the disputed facts in Kelley's favor.
2. Whether the district court was required to analyze both prongs of qualified immunity after identifying the genuinely disputed facts.

HOLDINGS

1. The district court erred by identifying disputed facts but failing to construe them in the light most favorable to Kelley and determine whether those facts established a constitutional violation of a clearly established right.
2. The district court's order denying qualified immunity on the excessive-force claim is vacated, and the case is remanded for a more detailed qualified-immunity analysis.

KEY QUOTATIONS

"The district court should have identified the disputed facts, construed them in the light most favorable to Kelley, and then considered, on those facts, whether Kelley had shown a violation of a constitutional right that was clearly established at the time of the incident." (at 5)

"We thus remand to the district court to allow it to consider both prongs of the qualified immunity analysis after construing the disputed facts in the light most favorable to Kelley." (at 6)

FACTUAL BACKGROUND

On December 25, 2019, Sergeant Pruett approached Kelley in a van parked in a driveway after observing an open beer can and smelling alcohol. After dispatch reported a prior DUI conviction and an active warrant, Kelley exited the van, later stood up, and ran up the driveway when Pruett told him to remain seated. Pruett tackled Kelley, and Deputy Roper helped secure and handcuff him. The parties disputed whether Kelley resisted or was combative and what techniques and degree of force the officers used after the takedown.

PROCEDURAL HISTORY

Kelley sued Pruett and Roper under § 1983 for unlawful arrest and excessive force in their official and individual capacities. The district court granted summary judgment on the official-capacity claims and false-arrest claims, but denied qualified immunity on the individual-capacity excessive-force claim. Pruett and Roper brought an interlocutory appeal challenging that denial.

DISPOSITION

vacated

REMAND INSTRUCTIONS

The district court must identify and construe the genuinely disputed facts in the light most favorable to Kelley, then determine whether those facts establish a constitutional violation and whether the right was clearly established at the time of the incident.

CASES CITED

- Sterling v. Bd. of Trs. of the Univ. of Ark., 42 F.4th 901, 904 (8th Cir. 2022)
- Watson v. Boyd, 2 F.4th 1106, 1109-10, 1112 (8th Cir. 2021)
- Stark v. Lee Cnty., 993 F.3d 622, 625 (8th Cir. 2021)
- Handt v. Lynch, 681 F.3d 939, 945 (8th Cir. 2012)
- Shannon v. Koehler, 616 F.3d 855, 864 n.5 (8th Cir. 2010)
- Walton v. Dawson, 752 F.3d 1109, 1116 (8th Cir. 2014)
- Graham v. Connor, 490 U.S. 386 (1989)
- Neal v. Ficcadenti, 895 F.3d 576, 582 (8th Cir. 2018)