

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
ARKANSAS, EL DORADO DIVISION

Jerry L. Gentry v. Gean Seiger, LeRoy Martin, and Jerry Maness

Civil No. 1:23-cv-01095-SGS · No. 1:23-cv-01095-SGS · Decided March 20, 2026

SUMMARY

The document is a memorandum opinion and order in a pro se 42 U.S.C. § 1983 action brought by Jerry L. Gentry against officials of the Columbia County Detention Center. The remaining claim concerns alleged deliberate indifference to serious medical needs, including injuries, chest pain, dizziness, and high blood pressure. The court considers the defendants’ second motion for summary judgment and states that it grants the motion in part and denies it in part.

CASE DETAILS

COURT	United States District Court for the Western District of Arkansas, El Dorado Division
WRITING FOR THE COURT	Spencer G. Singleton
JURISDICTION	United States District Court for the Western District of Arkansas, El Dorado Division
DECIDED	March 20, 2026
DOCKET	1:23-cv-01095-SGS
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff brought a 42 U.S.C. § 1983 action alleging excessive force and denial of medical care. After the excessive-force claim was dismissed and Tommy Rodgers was dismissed from the case, the remaining defendants moved for summary judgment on the medical-care claim.
STANDARD OF REVIEW	Summary judgment is appropriate when, viewing the facts and reasonable inferences in the light most favorable to the nonmoving party, there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. For qualified immunity, the court considers whether the facts show a constitutional violation and whether the right was clearly established, with disputed predicate facts construed in the nonmoving party's favor.
PRECEDENTIAL VALUE	nonprecedential

PARTIES

Jerry L. Gentry v. Gean Seiger, LeRoy Martin, Jerry Maness

TOPICS

section 1983

prisoners rights

summary judgment

qualified immunity

civil rights

PRACTICE AREAS

civil rights

constitutional law

prisoner civil rights

civil procedure

health law

QUESTIONS PRESENTED

1. Whether genuine disputes of material fact precluded summary judgment on Gentry's individual-capacity deliberate-indifference claim against Seiger.
2. Whether Gentry presented sufficient evidence that his alleged ankle injury and other symptoms constituted objectively serious medical needs.
3. Whether Gentry presented sufficient evidence that Seiger knew of and deliberately disregarded his serious medical needs.
4. Whether Martin and Maness could be liable under 42 U.S.C. § 1983 without evidence of personal involvement or direct responsibility for the alleged denial of medical care.
5. Whether Gentry established an official-capacity claim based on a county policy, custom, or practice.
6. Whether Seiger was entitled to qualified immunity at the summary-judgment stage.

HOLDINGS

1. A verified complaint may be treated as the equivalent of an affidavit for summary-judgment purposes, and Gentry's verified allegations could create factual disputes where the record contained no medical records and competing verified statements.
2. Summary judgment was inappropriate concerning the objective seriousness of Gentry's ankle injury because the evidence created a factual dispute over whether the injury was sufficiently obvious to require medical attention. The court assumed, for purposes of the opinion, that Gentry's other claimed injuries and ailments were objectively serious.
3. Genuine disputes of material fact precluded summary judgment for Seiger on Gentry's individual-capacity deliberate-indifference claim.
4. Martin and Maness were entitled to summary judgment because Gentry failed to establish personal involvement or direct responsibility for the alleged denial of medical care; supervisory liability cannot rest solely on respondeat superior.
5. Gentry's official-capacity claims failed because he did not show that the alleged denial of medical care resulted from an official policy, custom, or practice of Columbia County.
6. Seiger was not entitled to summary judgment on qualified-immunity grounds because genuine disputes existed concerning predicate facts material to whether she violated Gentry's clearly established right to adequate medical care.

KEY QUOTATIONS

“A verified complaint is the equivalent of an affidavit for summary judgment purposes.” (Factual Background)

“Given this competing evidence and underdeveloped summary judgment record, the Court finds genuine issues of material fact in dispute regarding whether Defendant Seiger deliberately disregarded Plaintiff’s serious medical needs.” (Defendant Seiger)

“In the event that a genuine dispute exists concerning predicate facts material to the qualified immunity issue, the defendant is not entitled to summary judgment on that ground.” (Qualified Immunity)

FACTUAL BACKGROUND

Gentry, a detainee or inmate at the Columbia County Detention Center, alleged that officers pushed him to the floor, causing an ankle injury and other symptoms, and that he later experienced chest pain, dizziness, high blood pressure, and loss of consciousness. He claimed that jail officials, including Seiger, Martin, and Maness, failed to obtain or provide adequate medical evaluation. The summary-judgment record contained verified allegations, affidavits, grievances, and incident reports, but no medical records documenting the treatment allegedly provided. The evidence conflicted regarding the seriousness of Gentry's injuries, whether he received medical care, and the extent of each defendant's knowledge and involvement.

PROCEDURAL HISTORY

The court previously dismissed the excessive-force claim with prejudice and dismissed Tommy Rodgers. Defendants then filed a second motion for summary judgment addressing the remaining denial-of-medical-care claim. The court granted summary judgment to Martin and Maness on all claims, granted summary judgment to Seiger on the official-capacity claim, and denied summary judgment to Seiger on the individual-capacity claim.

DISPOSITION

other

CASES CITED

- Roberson v. Hayti Police Department, 241 F.3d 992, 994-95 (8th Cir. 2001)
- Matsushita Electric Industrial Co. v. Zenith Radio Corp., 475 U.S. 574, 586-87 (1986)
- National Bank of Commerce v. Dow Chemical Co., 165 F.3d 602, 607, 610 (8th Cir. 1999)
- Scott v. Harris, 550 U.S. 372, 380 (2007)
- Gorman v. Bartch, 152 F.3d 907, 914 (8th Cir. 1998)
- West v. Atkins, 487 U.S. 42, 48 (1988)
- Dunham v. Wadley, 195 F.3d 1007, 1009 (8th Cir. 1999)
- Morris v. Craddock, 954 F.3d 1055, 1058 (8th Cir. 2020)
- Ivey v. Audrain County, Missouri, 968 F.3d 845, 848 (8th Cir. 2020)
- Jackson v. Buckman, 756 F.3d 1060, 1065 (8th Cir. 2014)

- Coleman v. Rahija, 114 F.3d 778, 784 (8th Cir. 1997)
- Jones v. Minnesota Department of Corrections, 512 F.3d 478, 482 (8th Cir. 2008)
- Reeves v. Sanderson Plumbing Products, Inc., 530 U.S. 133, 150 (2000)
- Pool v. Sebastian County, Arkansas, 418 F.3d 934, 945 (8th Cir. 2005)
- Hartsfield v. Colburn, 371 F.3d 454, 457 (8th Cir. 2004)
- Roberson v. Bradshaw, 198 F.3d 645, 648 (8th Cir. 1999)
- Dulany v. Carnahan, 132 F.3d 1234, 1240 (8th Cir. 1997)
- Barton v. Taber, 908 F.3d 1119, 1124 (8th Cir. 2018)
- Thompson v. King, 730 F.3d 742, 747 (8th Cir. 2013)
- Dantzler v. Baldwin, 133 F.4th 833, 846 (8th Cir. 2025)
- Allard v. Baldwin, 779 F.3d 768, 772 (8th Cir. 2015)
- Letterman v. Does, 789 F.3d 856, 862 (8th Cir. 2015)
- Monell v. Department of Social Services, 436 U.S. 654, 692 (1978)
- White v. Holmes, 21 F.3d 277, 280 (8th Cir. 1994)
- Keeper v. King, 130 F.3d 1309, 1314 (8th Cir. 1997)
- Clemmons v. Armontrout, 477 F.3d 962, 967 (8th Cir. 2007)
- Mayorga v. Missouri, 442 F.3d 1128, 1132 (8th Cir. 2006)
- Kulow v. Nix, 28 F.3d 855, 859 (8th Cir. 1994)
- McCoy v. City of Monticello, 411 F.3d 920, 922 (8th Cir. 2005)
- Veatch v. Bartels Lutheran Home, 627 F.3d 1254, 1257 (8th Cir. 2010)
- Murray v. Lene, 595 F.3d 868, 873 (8th Cir. 2010)
- Atkinson v. City of Mountain View, Missouri, 709 F.3d 1201, 1214 (8th Cir. 2013)
- Moyle v. Anderson, 571 F.3d 814, 817 (8th Cir. 2009)
- Johnson v. Hamilton, 452 F.3d 967, 973 (8th Cir. 2006)
- Brown v. City of Golden Valley, 574 F.3d 491, 495 (8th Cir. 2009)
- Malley v. Briggs, 475 U.S. 335, 341 (1986)
- Watson v. Boyd, 2 F.4th 1106, 1109 (8th Cir. 2021)
- Pace v. City of Des Moines, 201 F.3d 1050, 1056 (8th Cir. 2000)
- Pearson v. Callahan, 555 U.S. 223, 236 (2009)
- Dimock v. City of Brooklyn, 124 F.4th 544, 550 (8th Cir. 2024)