

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

Noah Wright v. Laconya Harris, et al.

Wright · No. 4:25-cv-00164-LPR-BBM · Decided January 20, 2026

SUMMARY

The United States District Court for the Eastern District of Arkansas adopts a partial recommended disposition with modifications in Noah Wright's civil rights action. The court permits an individual-capacity medical-deliberate-indifference claim against APN Seamster concerning refusal to provide an MRI for financial reasons, dismisses the other claims without prejudice, denies preliminary injunctive relief, and terminates several defendants.

CASE DETAILS

COURT	United States District Court for the Eastern District of Arkansas, Central Division
WRITING FOR THE COURT	Lee P. Rudofsky
JURISDICTION	United States District Court for the Eastern District of Arkansas, Central Division
DECIDED	January 20, 2026
DOCKET	4:25-cv-00164-LPR-BBM
DISPOSITION	other
PROCEDURAL POSTURE	After screening Plaintiff's amended prisoner civil-rights complaint and receiving a Partial Recommended Disposition from the magistrate judge, the district court conducted de novo review, adopted the recommendation except for specified modifications, allowed one individual-capacity claim to proceed, dismissed the remaining claims without prejudice, and denied Plaintiff's motion for a preliminary injunction and temporary restraining order.
STANDARD OF REVIEW	De novo review of the Partial Recommended Disposition; at the screening and motion-to-dismiss stage, factual allegations are accepted as true, but legal conclusions, unsupported conclusions, unwarranted inferences, and conclusory allegations are disregarded.
PRECEDENTIAL VALUE	nonprecedential

TOPICS

motions to dismiss

section 1983

prisoners rights

injunctions

civil rights

PRACTICE AREAS

prisoner civil rights

medical deliberate indifference

civil procedure

preliminary injunctions

QUESTIONS PRESENTED

1. Whether the retaliation claims stated a claim when the complaint lacked factual allegations showing a causal connection between Plaintiff's grievance and the cell search.
2. Whether the allegations that Wellpath and its employees maintained an unconstitutional policy or custom were sufficient to state a claim concerning the refusal to order an MRI.
3. Whether Plaintiff stated an individual-capacity medical-deliberate-indifference claim against APN Seamster based on the alleged refusal to provide an MRI for financial reasons.
4. Whether Plaintiff was entitled to a preliminary injunction or temporary restraining order.

HOLDINGS

1. The retaliation claims failed at the screening stage because the complaint alleged no facts establishing a causal connection between the grievance and the cell search.
2. The complaint did not state a viable claim against Wellpath or viable official-capacity claims against Wellpath employees because the allegation of a policy or custom was a conclusory legal assertion unsupported by specific facts.
3. Plaintiff may proceed with his individual-capacity medical-deliberate-indifference claim against APN Seamster based on the alleged refusal to provide an MRI for financial reasons.
4. Plaintiff was not entitled to a preliminary injunction or temporary restraining order.

KEY QUOTATIONS

"This statement is the very quintessence of a legal conclusion." (at 6)

"The Court need not and should not accept such conclusory allegations even at the motion-to-dismiss stage."
(at 6)

"All other claims are DISMISSED without prejudice for failure to state a claim for relief upon which relief may be granted."

FACTUAL BACKGROUND

Plaintiff alleged that defendants retaliated against him in connection with a grievance and a one-time cell search. He also alleged that APN Seamster refused to order an MRI for financial reasons and that Wellpath and other

defendants maintained policies or customs causing unconstitutional medical practices. The court found the retaliation allegations lacked facts connecting the grievance to the cell search and found the policy-and-custom allegation conclusory.

PROCEDURAL HISTORY

United States Magistrate Judge Benecia B. Moore submitted a Partial Recommended Disposition. No objections were filed, and the district court reviewed the recommendation de novo, adopted it except as to the retaliation and MRI-related claims, and entered the specified screening order.

DISPOSITION

other

CASES CITED

- Wiles v. Capitol Indem. Corp., 280 F.3d 868, 870 (8th Cir. 2002)

OPINION

IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION NOAH WRIGHT PLAINTIFF ADC #117292 v. Case No. 4:25-cv-00164-
LPR-BBM LACONYA HARRIS, et al. DEFENDANTS ORDER The Court has received the
Partial Recommended Disposition (PRD) submitted by United States Magistrate Judge Benecia B.
Moore (Doc. 16). No objections have been filed, and the time for doing so has expired.

After a de novo review of the PRD, along with careful consideration of the entire case record, the Court hereby approves and adopts the PRD as its findings and conclusions in all respects, except as follows. First, the Court is not taking a position on whether a one-time cell search could be an adverse action for purposes of a retaliation claim.

The lack of fact allegations concerning a causal connection between the grievance and the cell-search is enough to screen out the retaliation claim(s). Second, the Court disagrees with the PRD's assessment that the Plaintiff has stated a viable cause of action against Wellpath (or viable official capacity claims against any Wellpath employees) as to the MRI issue.

The only relevant part of Plaintiff's Complaint says that: "Wellpath and other defendants created a policy and custom[] under which the unconstitutional practices occurred and allowed the continuance of policies, practices, and customs to save the company money."¹ This statement is the very quintessence of a legal conclusion.

The Court need 1 Am. Compl. (Doc. 12) at 6. not and should not accept such conclusory allegations even at the motion-to-dismiss stage." With no other relevant allegations, it is sheer

speculation to assume that Seamster's decision to not order an MRI was based on a company practice, policy, or custom.

Third, the Court's conclusions with respect to the surviving individual-capacity claim against Seamster are highly tentative and a strong motion to dismiss might change the Court's mind. Accordingly, IT IS HEREBY ORDERED that: 1. Plaintiff may proceed with his medical-deliberate-indifference claim against APN Seamster in his individual capacity for refusing to provide Plaintiff an MRI for financial reasons.

2. All other claims are DISMISSED without prejudice for failure to state a claim for relief upon which relief may be granted. 3. Plaintiff's Motion for Preliminary Injunction and Temporary Restraining Order (Doc. 13) is DENIED. 4.

The Clerk is instructed to terminate Laconya Harris, Aundrea Culclager, Auruyla Simpson, Jasper, and WellPath Medical Corporation as parties to this action. 5. The Court certifies, pursuant to 28 U.S.C. § 1915(a)(3), that an in forma pauperis appeal of this Order would not be taken in good faith. IT IS SO ORDERED this 20th day of January 2026. fh 5 a <2 — LEE P. RUDOFISKY UNITED STATES DISTRICT JUDGE 2 See Wiles v. Capitol Indem.

Corp., 280 F.3d 868, 870 (8th Cir. 2002) ("While the court must accept allegations of fact as true when considering a motion to dismiss, the court is free to ignore legal conclusions, unsupported conclusions, unwarranted inferences and sweeping legal conclusions cast in the form of factual allegations.").