

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PRECEDENTIAL VALUE	nonprecedential

PARTIES

Noah Wright v. Laconya Harris, et al.

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)

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