

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF  
ARKANSAS

Phillip Stallworth and Darius Shines v. Flatfoot Trucking, LLC and  
James D. Watkins

Stallworth · No. 2:24CV00184 JM · Decided February 18, 2026

SUMMARY

The United States District Court for the Eastern District of Arkansas considered Defendants’ motion for partial summary judgment in a negligence action arising from a vehicle collision with cattle that escaped from a burning tractor-trailer. The court held that Plaintiffs could pursue direct-negligence evidence concerning Flatfoot Trucking’s equipment maintenance, but that other alleged policy failures were barred or irrelevant under the Elrod doctrine. The court granted summary judgment on punitive damages and otherwise granted the motion in part and denied it in part.

CASE DETAILS

|                    |                                                                                                                                                                                                                                                      |
|--------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT              | United States District Court for the Eastern District of Arkansas                                                                                                                                                                                    |
| JURISDICTION       | United States District Court for the Eastern District of Arkansas                                                                                                                                                                                    |
| DECIDED            | February 18, 2026                                                                                                                                                                                                                                    |
| DOCKET             | 2:24CV00184 JM                                                                                                                                                                                                                                       |
| DISPOSITION        | other                                                                                                                                                                                                                                                |
| PROCEDURAL POSTURE | Defendants moved for partial summary judgment on the plaintiffs' direct-negligence claims against Flatfoot Trucking and on punitive damages.                                                                                                         |
| STANDARD OF REVIEW | Summary judgment is appropriate when there is no genuine issue of material fact and the moving party is entitled to judgment as a matter of law. Only disputes over facts that may affect the outcome under governing law preclude summary judgment. |
| PRECEDENTIAL VALUE | Unknown; district court order with no published reporter citation                                                                                                                                                                                    |
| PARTIES            | Phillip Stallworth, Darius Shines v. Flatfoot Trucking, LLC, James D. Watkins                                                                                                                                                                        |

TOPICS

- summary judgment
- punitive damages
- negligence
- negligent hiring
- civil procedure

## PRACTICE AREAS

Civil procedure

Torts

Damages

## QUESTIONS PRESENTED

1. Whether the Elrod doctrine barred plaintiffs' direct-negligence claims against Flatfoot Trucking because Flatfoot admitted that Watkins was its agent.
2. Whether evidence concerning Flatfoot Trucking's equipment maintenance and servicing created an exception to the Elrod doctrine sufficient to allow direct-negligence evidence against Flatfoot.
3. Whether evidence concerning the absence of pre-hiring drug-screening documentation and a written employment application was relevant to the accident or created an exception to the Elrod doctrine.
4. Whether plaintiffs presented sufficient evidence to submit their punitive-damages claim to a jury.

## HOLDINGS

1. Because a genuine issue of material fact existed regarding whether Flatfoot Trucking properly serviced and maintained its equipment, plaintiffs could present evidence of Flatfoot's direct negligence on that issue.
2. The absence of documentation of a pre-hiring drug screen or a proper employment application for Watkins did not create an exception to the Elrod doctrine and was not relevant because plaintiffs presented no evidence connecting those omissions to the accident.
3. Plaintiffs failed to present evidence from which a reasonable jury could find the motive, intent, disposition, or reckless disregard required for punitive damages under Arkansas law; therefore, summary judgment was warranted on the punitive-damages claim.

## KEY QUOTATIONS

*"The inquiry performed is the threshold inquiry of determining whether there is a need for trial -- whether, in other words, there are genuine factual issues that properly can be resolved only by a finder of fact because they may reasonably be resolved in favor of either party."* (unpaginated)

*"Nothing in the summary judgment record would permit a reasonable jury to find that the Defendants had a motive, intent or disposition to do anything injurious to others."* (unpaginated)

## FACTUAL BACKGROUND

On May 24, 2024, Phillip Stallworth was driving westbound on Interstate 40 in St. Francis County, Arkansas, with Darius Shines as a passenger. A tractor-trailer operated by James D. Watkins and owned by Flatfoot Trucking caught fire while transporting cattle, causing cattle to escape onto the interstate. Stallworth's vehicle struck one of the cattle, injuring both plaintiffs. The record included testimony that the fire may have resulted from a brake or bearing failure on the trailer's rear axle.

## PROCEDURAL HISTORY

Plaintiffs filed this diversity action after their vehicle struck cattle that had escaped from a burning tractor-trailer operated by James D. Watkins and owned by Flatfoot Trucking. Plaintiffs asserted negligence, respondeat superior, negligent hiring, negligent training, negligent supervision, negligent retention, negligent monitoring, and ratification claims. The district court granted in part and denied in part defendants' motion for partial summary judgment.

#### DISPOSITION

other

#### CASES CITED

- Holloway v. Lockhart, 813 F.2d 874 (8th Cir. 1987)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 250 (1986)
- Inland Oil & Transport Co. v. United States, 600 F.2d 725 (8th Cir. 1979), cert. denied, 444 U.S. 991 (1979)
- Counts v. M.K. Ferguson Co., 862 F.2d 1338, 1339 (8th Cir. 1988)
- City of Mt. Pleasant v. Associated Elec. Coop., 838 F.2d 268, 273-274 (8th Cir. 1988)