

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

Walter R. Sexton v. Watkins, et al.

Sexton · No. 4:25CV00526-LPR-JTK · Decided February 11, 2026

SUMMARY

This document is a United States magistrate judge’s Proposed Findings and Recommendations in a prisoner civil-rights action concerning allegedly inadequate sleeping mats and discriminatory treatment at the Faulkner County Detention Center. The magistrate judge recommends granting defendants’ summary-judgment motion because the plaintiff failed to exhaust available administrative remedies, dismissing the claims and complaint without prejudice, and certifying that an appeal would not be taken in good faith.

CASE DETAILS

COURT	United States District Court for the Eastern District of Arkansas, Central Division
WRITING FOR THE COURT	Jerome T. Kearney, United States Magistrate Judge
DECIDED	February 11, 2026
DOCKET	4:25CV00526-LPR-JTK
DISPOSITION	dismissed
PROCEDURAL POSTURE	Prisoner civil-rights action under 42 U.S.C. § 1983. Defendants moved for summary judgment on the ground that Plaintiff failed to exhaust available administrative remedies under the Prison Litigation Reform Act. Plaintiff did not respond, and the magistrate judge issued Proposed Findings and Recommendations recommending that the motion be granted and the action be dismissed without prejudice.
STANDARD OF REVIEW	Summary judgment is appropriate when the record shows no genuine dispute of material fact and the moving party is entitled to judgment as a matter of law. Facts are viewed in the light most favorable to the nonmoving party, but the nonmovant must identify specific facts showing a genuine issue for trial. Under the PLRA, exhaustion of available administrative remedies is mandatory before a prisoner may bring an action concerning prison conditions.
PRECEDENTIAL VALUE	Nonprecedential proposed findings and recommendations

PARTIES

Walter R. Sexton v. Watkins, Harrison, Arditi, C. Smith, Jacob Cooper, Clark Ussery, Rye

TOPICS

summary judgment

prisoners rights

section 1983

civil procedure

civil rights

PRACTICE AREAS

Prisoner civil rights

Civil procedure

Summary judgment

Administrative exhaustion

QUESTIONS PRESENTED

1. Whether Defendants were entitled to summary judgment because Plaintiff failed to exhaust available administrative remedies before filing his § 1983 action.
2. Whether Plaintiff's failure to respond permitted the court to deem Defendants' asserted material facts admitted under the local rules and Federal Rule of Civil Procedure 56.
3. Whether Plaintiff's complaint should be dismissed without prejudice for failure to exhaust.

HOLDINGS

1. The Prison Litigation Reform Act requires a prisoner to exhaust available administrative remedies before bringing an action concerning prison conditions under § 1983 or other federal law.
2. Plaintiff failed to exhaust available administrative remedies because he filed no grievance related to the claims in this lawsuit before initiating the action.
3. Summary judgment was appropriate because Plaintiff did not controvert Defendants' asserted material facts and the undisputed record established nonexhaustion.
4. The PLRA itself does not require that every defendant be specifically named in an administrative grievance; the applicable prison grievance requirements define the boundaries of proper exhaustion.

KEY QUOTATIONS

“Congress has mandated exhaustion clearly enough, regardless of the relief offered through administrative procedures.” (532 U.S. at 741)

“If exhaustion was not completed at the time of filing, dismissal is mandatory.” (340 F.3d at 627)

“The Court agrees that, based on the record before me, Plaintiff did not file a grievance related to his claims in this case.” (Opinion analysis)

FACTUAL BACKGROUND

Walter R. Sexton, an inmate at the Faulkner County, Arkansas, Detention Center, alleged that he was given a torn, under-stuffed floor mat that smelled of urine and mildew and that he was denied a new mattress provided to other inmates. He also alleged that detention-center officials made disparaging comments about inmates housed in a unit containing people with pending sex-offense charges and that he was discriminated against. The

detention center had a grievance procedure requiring an initial verbal attempt, a written grievance within ten days, and an appeal within five working days. Records and an affidavit from the detention-center administrator showed that Sexton filed no grievance concerning the claims at issue.

PROCEDURAL HISTORY

Plaintiff filed a complaint alleging that detention-center officials denied him an adequate floor mat or mattress and made discriminatory comments. Defendants moved for summary judgment on exhaustion. After Plaintiff failed to respond despite being warned that Defendants' factual assertions could be deemed admitted, the court deemed the asserted facts admitted, found that Plaintiff had filed no grievance concerning the claims, and recommended dismissal without prejudice. Claims against Defendants Hazelback and Hervey had previously been recommended for termination for lack of service and failure to prosecute.

DISPOSITION

dismissed

CASES CITED

- *Dulany v. Carnahan*, 132 F.3d 1234, 1237 (8th Cir. 1997)
- *Webb v. Lawrence County*, 144 F.3d 1131, 1134-35 (8th Cir. 1998)
- *Celotex Corp. v. Catrett*, 477 U.S. 317, 323 (1986)
- *Booth v. Churner*, 532 U.S. 731, 741 (2001)
- *Chelette v. Harris*, 229 F.3d 684, 688 (8th Cir. 2000)
- *Castano v. Nebraska Dep't of Corrections*, 201 F.3d 1023, 1025 (8th Cir. 2000)
- *Johnson v. Jones*, 340 F.3d 624, 627 (8th Cir. 2003)
- *Jones v. Bock*, 549 U.S. 199, 218 (2007)
- *Wilson v. Miller*, 821 F.3d 963, 970 (8th Cir. 2016)
- *Bolderson v. City of Wentzville, Missouri*, 840 F.3d 982, 986-87 (8th Cir. 2016)

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