

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

Joseph Terrell Ramey v. Eric Higgins, Sheriff, Pulaski County
Regional Detention Facility; et al.

Ramey · No. 4:25-cv-00408-JJV · Decided December 17, 2025

SUMMARY

The court denied Joseph Terrell Ramey's motion for a preliminary injunction in his 42 U.S.C. § 1983 action concerning injuries allegedly sustained in a Pulaski County transport-van accident and subsequent medical care. The court held that the requested relief involved unrelated parties and issues and that Ramey failed to establish irreparable harm, particularly because the accident occurred more than two years earlier and he was receiving treatment. The court also certified that an appeal in forma pauperis would not be taken in good faith.

CASE DETAILS

COURT	United States District Court for the Eastern District of Arkansas, Central Division
JURISDICTION	United States District Court for the Eastern District of Arkansas, Central Division
DECIDED	December 17, 2025
DOCKET	4:25-cv-00408-JJV
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff, a prisoner proceeding under 42 U.S.C. § 1983, moved for a preliminary injunction seeking medical-related relief concerning injuries allegedly sustained in a transportation-van accident. The district court denied the motion.
STANDARD OF REVIEW	Preliminary-injunction relief is evaluated under the Dataphase factors: threat of irreparable harm, balance of harms, probability of success on the merits, and the public interest. The movant bears the burden of proof and must establish a threat of irreparable harm.
PRECEDENTIAL VALUE	Unpublished district-court memorandum and order; persuasive or nonprecedential value only.

PARTIES

Joseph Terrell Ramey v. Eric Higgins, Sheriff, Pulaski County
Regional Detention Facility, et al.

TOPICS

injunctions

prisoners rights

section 1983

civil rights

remedies

PRACTICE AREAS

civil rights

prisoner litigation

injunctive relief

constitutional law

QUESTIONS PRESENTED

1. Whether Plaintiff was entitled to a preliminary injunction under the *Dataphase* factors.
2. Whether the requested injunctive relief was improper because it sought affirmative relief concerning matters and parties unrelated to the claims in the complaint.
3. Whether Plaintiff established a threat of irreparable harm sufficient to warrant preliminary-injunction relief.

HOLDINGS

1. A preliminary injunction should not issue unless the movant establishes a threat of irreparable harm; the movant bears the burden of proving entitlement to the injunction under the *Dataphase* factors.
2. A preliminary injunction is inappropriate when it seeks affirmative relief concerning matters lying wholly outside the issues in the suit or involving unrelated parties.

KEY QUOTATIONS

“The burden of proving that a preliminary injunction should be issued rests entirely with the movant.” (at 1)

“This is sufficient ground — on its own — to deny motion for preliminary injunction.” (at 2)

FACTUAL BACKGROUND

Ramey, an Arkansas prisoner, alleged that he was injured on September 11, 2023, when a Pulaski County transportation van collided with another vehicle. He attributed his injuries to Deputy Sherry Brown's reckless driving and Sheriff Eric Higgins's alleged policy of not providing seatbelts to fully restrained passengers. He also alleged that Deputies Kawhun Tims and Dedrick Remmer later denied him adequate medical care. In support of his preliminary-injunction motion, he asserted that he continued to suffer pain and that ADC officials had refused certain radiographic procedures, while defendants submitted records indicating that he was receiving medical treatment.

PROCEDURAL HISTORY

Ramey filed a § 1983 complaint alleging constitutional violations arising from a 2023 transportation-van collision and subsequent denial of medical care. He later moved for a preliminary injunction, and the defendants

responded with records showing that he had received medical treatment. The court denied the motion and certified that an in forma pauperis appeal would not be taken in good faith.

DISPOSITION

other

CASES CITED

- Dataphase Systems, Inc. v. C.L. Systems, Inc., 640 F.2d 109, 113 (8th Cir. 1981) (en banc)
- Randolph v. Rodgers, 170 F.3d 850, 856 (8th Cir. 1999)
- Goff v. Harper, 60 F.3d 518, 520-21 (8th Cir. 1995)
- Rogers v. Scurr, 676 F.2d 1211, 1214 (8th Cir. 1982)
- DeBeers Consol. Mines Ltd. v. United States, 325 U.S. 212, 220 (1945)
- Owens v. Severin, Case No. 08-1418, 2008 WL 4240153 (Sept. 18, 2008)

OPINION

IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION JOSEPH TERRELL RAMEY ADC #087050 PLAINTIFF v. 4:25-cv-
00408-JJV ERIC HIGGINS, Sheriff, Pulaski County Regional Detention Facility; et al.
DEFENDANTS MEMORANDUM AND ORDER I. INTRODUCTION Joseph Terrell Ramey
("Plaintiff") is a prisoner in the Arkansas Division of Correction ("ADC") who has filed a
Complaint seeking relief, pursuant to 42 U.S.C. § 1983, for constitutional violations that allegedly
occurred while he was a convicted prisoner in the custody of Pulaski County officials.

Plaintiff says on September 11, 2023, he was injured when a transportation van driven by Pulaski
County Deputy Sherry Brown collided with another vehicle. (Doc. 2.) Plaintiff says his injuries
were caused by Defendant Brown's reckless driving and Sheriff Eric Higgins's policy or practice
of not providing seatbelts for fully restrained passengers. And after the collision, Deputy Kawhun
Tims and Deputy Dedrick Remmer allegedly denied Plaintiff adequate medical care for his
injuries.

On November 17, 2025, Plaintiff filed a Motion for a Preliminary Injunction. (Doc. 35.)
Defendants have responded, (Doc. Nos. 36-37), so the matter is ripe for a decision. After careful
consideration of Plaintiff's Motion and Defendants' Response, I find the Motion must be
DENIED. II. DISCUSSION In deciding whether to grant injunctive relief, courts must consider
the following factors: 1 (1) the threat of irreparable harm to the movant; (2) the state of balance
between the harm and the injury that granting the injunction will inflict on the other party litigants;
(3) the probability that the movant will succeed on the merits; and (4) the public interest.

Dataphase Systems, Inc. v. C.L. Systems, Inc., 640 F.2d 109, 113 (8th Cir. 1981) (en banc). No single factor is dispositive, but the movant must establish a threat of irreparable harm. *Id.* Without such a finding, a preliminary injunction should not be issued. *Randolph v. Rodgers*, 170 F.3d 850, 856 (8th Cir. 1999). “The burden of proving that a preliminary injunction should be issued rests entirely with the movant.” *Goff v. Harper*, 60 F.3d 518, 520 (8th Cir.

1995). The *Goff* court also addressed the district court’s role in inmate applications for injunctive relief as follows: “[I]n the prison context, a request for injunctive relief must always be viewed with great caution because ‘judicial restraint is especially called for in dealing with the complex and intractable problems of prison administration.’... ‘[T]he courts should not get involved unless either a constitutional violation has already occurred or the threat of such a violation is both real and immediate.’” *Id.* at 520-21 (quoting *Rogers v. Scurr*, 676 F.2d 1211, 1214 (8th Cir.

1982)). Plaintiff’s Motion says he is still suffering from the injuries sustained in the Pulaski County transport van accident and the ADC “adamantly refused to order any kind of radiographic procedures [] to find the source and the extent of the injury and excruciating pain in [his] right leg, [] right hip and midsection area, which serves to prolong [his] pain and suffering.” (Doc.

No. 35 at 3.) Defendants respond, “Plaintiff’s ADC records reflect that he has received medical treatment for his purported injuries,” (Doc. No. 36 at 1), and they have provided documentation supporting their assertion. (Doc. No. 36-1.) Additionally, they say, “The Pulaski County Defendants have no authority to direct medical treatment decisions to be made by the Arkansas Department of Corrections.” (*Id.*)

2 Plaintiff’s Motion is denied for the following reasons. Rather than seeking to preserve the status quo, Plaintiff is attempting to obtain affirmative relief regarding issues involving unrelated parties. See *DeBeers Consol. Mines Ltd. v. United States*, 325 U.S. 212, 220 (1945) (a preliminary injunction is inappropriate for dealing with matters “lying wholly outside the issues in the suit”); *Owens v. Severin*, Case No. 08-1418, 2008 WL 4240153 (Sept.

18, 2008) (unpublished opinion) (denying a prisoner’s request for a preliminary injunction because “the relief sought was unrelated to the allegations in his [§ 1983] complaint”). Additionally, Plaintiff has failed to carry his burden of establishing that irreparable harm will befall him in the absence of injunctive relief. This is sufficient ground — on its own — to deny motion for preliminary injunction.

Dataphase, 640 F.2d at 114n.9. Plaintiff’s accident is from over two years ago and he is currently being treated by prison authorities. Accordingly, I conclude Plaintiff is not entitled to a preliminary injunction pursuant to Fed. R. Civ. P. 65(a).

I. CONCLUSION 1. Plaintiff’s Motion for a Preliminary Injunction (Doc. 35) is DENIED. 2. The Court certifies, pursuant to 28 U.S.C. § 1915(a)(3), that an in forma pauperis appeal from this

Order would not be taken in good faith. SO ORDERED this 17th day of December 2025. STATES
MAGISTRATE JUDGE

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