

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PRECEDENTIAL VALUE	Unpublished district-court memorandum and order; persuasive or nonprecedential value only.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)

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