

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
ARKANSAS, HOT SPRINGS DIVISION

Jeremiah Earl Walton v. Dr. Guy Micheal Henry, Ouachita River
Correctional Unit, Superintendent Jared Byers, and Wellpath Health
Services

Walton · No. 6:25-cv-6015 · Decided December 18, 2025

SUMMARY

The United States District Court for the Western District of Arkansas adopts a magistrate judge’s Report and Recommendation concerning claims arising from alleged retaliation and medical care in a correctional facility. The court dismisses without prejudice the claims against Wellpath Health Services and Dr. Guy Micheal Henry due to the effect of Wellpath’s bankruptcy plan and permits the First Amendment retaliation claim against Jared Byers to proceed.

CASE DETAILS

COURT	United States District Court for the Western District of Arkansas, Hot Springs Division
WRITING FOR THE COURT	Susan O. Hickey
JURISDICTION	United States District Court for the Western District of Arkansas, Hot Springs Division
DECIDED	December 18, 2025
DOCKET	6:25-cv-6015
DISPOSITION	other
PROCEDURAL POSTURE	The district court reviewed a magistrate judge's Report and Recommendation concerning dismissal of claims affected by Wellpath's bankruptcy plan and a remaining First Amendment retaliation claim under 42 U.S.C. § 1983.
STANDARD OF REVIEW	Clear-error review applies to a magistrate judge's recommendation when the party's objection is not specific enough to require de novo review.
PRECEDENTIAL VALUE	unpublished
PARTIES	Jeremiah Earl Walton v. Dr. Guy Micheal Henry, Ouachita River Correctional Unit, Superintendent Jared Byers, Wellpath Health

TOPICS

bankruptcy civil procedure section 1983 first amendment

PRACTICE AREAS

civil procedure bankruptcy civil rights constitutional law

QUESTIONS PRESENTED

1. Whether a nonspecific objection to a magistrate judge's Report and Recommendation requires de novo review or permits clear-error review.
2. Whether the district court should adopt the Report and Recommendation and dismiss Walton's claims against Wellpath and Dr. Guy Micheal Henry without prejudice based on Wellpath's bankruptcy plan and Walton's failure to opt out of the third-party releases.
3. Whether Walton's First Amendment retaliation claim against Jared Byers should remain pending.

HOLDINGS

1. A specific objection is necessary to require de novo review of a magistrate judge's recommendation; when the objection does not address the recommendation's analysis, the district court may review the recommendation for clear error.
2. The district court adopted the Report and Recommendation and dismissed Walton's claims against Wellpath and Dr. Guy Micheal Henry without prejudice.
3. Walton's First Amendment retaliation claim against Jared Byers may proceed.

KEY QUOTATIONS

“Consequently, the Court need only review Judge Comstock’s recommendations for clear error.”

“Accordingly, Plaintiff’s claims against Defendants Wellpath and Dr. Guy Micheal Henry are DISMISSED WITHOUT PREJUDICE. Plaintiff’s claim against Defendant Jared Byers may proceed.”

FACTUAL BACKGROUND

Wellpath had previously declared bankruptcy, and its bankruptcy plan permanently enjoined claims against Wellpath and required plaintiffs to opt out of third-party releases to pursue individual-capacity claims against Wellpath employees. Walton completed a court-directed declaration indicating that he had not opted out of those third-party releases. The Report and Recommendation concluded that his claims against Wellpath and Wellpath employee Jared Byers could not proceed on that basis, while the district court’s order separately allowed the First Amendment retaliation claim against Byers to proceed.

PROCEDURAL HISTORY

Magistrate Judge Christy D. Comstock recommended dismissal without prejudice of Walton's claims against Wellpath and Dr. Guy Micheal Henry while allowing the First Amendment retaliation claim against Jared Byers to remain. Walton filed a timely objection, but it did not address the magistrate judge's analysis. The district court therefore reviewed the recommendation for clear error, found none, adopted the Report and Recommendation in toto, dismissed the claims against Wellpath and Henry without prejudice, and allowed the claim against Byers to proceed.

DISPOSITION

other

CASES CITED

- Layne v. Wellpath, Case No. 6:24-cv-06082-SOH-MEF, ECF Nos. 78 & 78-1
- Thompson v. Nix, 897 F.2d 356, 357-58 (8th Cir. 1990)

OPINION

Walton

PER CURIAM.

IN THE UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF ARKANSAS

HOT SPRINGS DIVISION

JEREMIAH EARL WALTON PLAINTIFF

v. Case No. 6:25-cv-6015 DR. GUY MICHEAL HENRY, Ouachita River Correctional Unit ('ORCU');

SUPERINTENDENT JARED BYERS,

ORCU; and WELLPATH HEALTH SERVICES DEFENDANTS

ORDER

Before the Court is a Report and Recommendation ("R&R") issued by the Honorable Christy D. Comstock, United States Magistrate Judge for the Western District of Arkansas. ECF No. 17. Judge Comstock recommends that Plaintiff's claims against Defendants Wellpath Health Services ("Wellpath") and Dr. Guy Micheal Henry be dismissed without prejudice, and that Plaintiff's First Amendment retaliation claim against Defendant Jared Byers pursuant to 42 U.S.C. § 1983 should remain for further consideration. Judge Comstock explains that Wellpath previously declared bankruptcy and that Wellpath's bankruptcy plan "permanently enjoins Plaintiff from commencing or continuing any action against Wellpath, LLC, and that Plaintiff must opt-out of the third-party releases in the Plan in order to proceed in District Court for any individual capacity claims against Wellpath employees."¹ Judge Comstock then notes that the Court directed OF Plaintiff to complete a Declaration form indicating his current status in the case. ECF No. 8. Plaintiff submitted the completed Declaration, which indicated that he had not opted out of the third-party releases. Judge

Comstock concludes that this indicates that Plaintiff's claims against Wellpath and Jared Byers, a Wellpath employee, cannot proceed. 1 See, e.g., Layne v. Wellpath, Case No. 6:24-cv-06082-SOH-MEF, ECF Nos. 78 & 78-1. Plaintiff filed a timely objection. ECF No. 22. However, even under a liberal construction, Plaintiff makes no arguments that address Judge Comstock's analysis or the basis for the recommendation. Instead, he simply voices complaints about the prior stay of this matter while Wellpath's bankruptcy proceedings finalized. Consequently, the Court need only review Judge Comstock's recommendations for clear error. See Thompson v. Nix, 897 F.2d 356, 357-58 (8th Cir. 1990) (noting that a specific objection is necessary to require a de novo review of a magistrate's recommendation instead of a review for clear error). Upon review, finding no clear error on the face of the record and that Judge Comstock's reasoning is sound, the Court adopts the R&R (ECF No. 17) in toto. Accordingly, Plaintiff's claims against Defendants Wellpath and Dr. Guy Micheal Henry are DISMISSED WITHOUT PREJUDICE. Plaintiff's claim against Defendant Jared Byers may proceed. IT IS SO ORDERED, this 18th day of December, 2025. /s/ Susan O. Hickey Susan O. Hickey United States District Judge