

United States Court of Appeals
For the Eighth Circuit

No. 24-3087

Jakia T. Moss, Administratrix and Personal Representative of the Estate of James
Adam Wright, Jr.

Plaintiff - Appellant

v.

Anita Cogbill; Jail Administrator Gean Sieger, Columbia County Jail; Leroy
Martin, Columbia County Jail; Deputy Sheriff Jerry Maness, Columbia County
Jail; John and Jane Doe, a Columbia County Jail official

Defendants - Appellees

Appeal from United States District Court
for the Western District of Arkansas - El Dorado

Submitted: April 14, 2026
Filed: September 9, 2026
[Unpublished]

Before BENTON, ERICKSON, and KOBES, Circuit Judges.

PER CURIAM.

James Wright, Jr. was a pretrial detainee at the Columbia County Detention Center in Magnolia, Arkansas. His cell was in Pod 2. Down the hall, other inmates were housed in cells in Pod 5, a segregated unit where no more than one cell was

supposed to be open at a time. But Pod 5 inmates had been breaking out of their cells for three months, and—at some point—started stuffing clothing between the pod door and its frame to prevent the pod door from locking. On August 14, 2023, Wright spat at one of the Pod 5 inmates, allegedly threatened another, and filed a grievance with defendant Gean Sieger claiming that a Pod 5 inmate threw urine at him.

On August 26, as officers were bringing Wright and others through the main hallway, three Pod 5 inmates escaped from their cells, breached the pod door, ran into the hallway, and attacked Wright and the others with knives and metal objects. Officers intervened and put an end to the assault, but Wright suffered a serious head injury.

Wright sued prison officials under 42 U.S.C. § 1983, claiming that they failed to protect him from the attack in violation of his constitutional rights.¹ The district court² granted summary judgment in favor of the defendants. See Fed. R. Civ. P. 56(a). We review *de novo*, viewing the record in the light most favorable to Wright. Young v. Selk, 508 F.3d 868, 870 (8th Cir. 2007).

“A prison official’s ‘deliberate indifference’ to a substantial risk of serious harm to an inmate violates the Eighth Amendment.” Farmer v. Brennan, 511 U.S. 825, 828 (1994) (citation omitted); see Walton v. Dawson, 752 F.3d 1109, 1118 (8th Cir. 2014) (applying deliberate-indifference standard to evaluate Fourteenth Amendment claims by pretrial detainees). A claim arising from a prison official’s failure to protect an inmate from another inmate’s violence has two elements.

¹Wright filed this appeal *pro se* but died while the appeal was pending. We appointed counsel, who filed a supplemental brief, and Jakia Moss was substituted as administratrix and personal representative of Wright’s estate. See Fed. R. App. P. 43(a)(1).

²The Honorable Christy Comstock, now Chief United States Magistrate Judge for the Western District of Arkansas, to whom the case was referred for final disposition by consent of the parties pursuant to 28 U.S.C. § 636(c).

Farmer, 511 U.S. at 834. The first is objective: There must be a “substantial risk of serious harm.” Id.; see Vandevender v. Sass, 970 F.3d 972, 977 (8th Cir. 2020). The second is subjective: The official “must have been deliberately indifferent,” meaning “he or she actually kn[ew] of the substantial risk and fail[ed] to respond reasonably to it.” Young, 508 F.3d at 873 (citation omitted); see Farmer, 511 U.S. at 837.

The district court decided that Wright met the objective element of the deliberate-indifference test, a conclusion we accept because the defendants do not challenge it on appeal. See Latorre v. United States, 193 F.3d 1035, 1037 n.1 (8th Cir. 1999) (declining to “address issues not raised by a litigant on appeal”).

On the subjective element, there was evidence that defendants Anita Cogbill, Jerry Maness, and Leroy Martin knew of the risk. Wright asked in an interrogatory what was done before August 26 to prevent inmates from breaking out of their cells. The three replied, “Making staff aware that inmates were stuffing materials such as socks or t-shirts between the door and the door frame *until we could get the road department in to look at the Pod door.*” Elsewhere in the record, though, the defendants testified they did not know that inmates had tampered with the pod door. Resolving this apparent factual inconsistency in Wright’s favor, as we must, a reasonable jury could find that Cogbill, Maness, and Martin had actual knowledge that inmates were stuffing materials between the pod door and its frame to defeat the lock.³

But considering what the defendants did in response, no reasonable jury could find they “consciously disregarded” the risk of a sometimes-tampered-with pod door when they did not immediately fix it. See Farmer, 511 U.S. at 839 (cleaned up). The defendants alerted jail staff. Sieger “asked the road department to come to the jail and weld plates to the doors to prevent them from opening.” Officers escorted inmates as they passed through the hallway outside the pod door and intervened

³There is no evidence that Sieger knew inmates were tampering with the pod door before Wright was attacked. Nor is there evidence that the other defendants knew about the incidents between Wright and the Pod 5 inmates before the attack.

immediately when Wright was attacked. Together these measures were a reasonable response to the risk, so the defendants are entitled to qualified immunity. See id. at 844 (“[P]rison officials who actually knew of a substantial risk to inmate health or safety may be found free from liability if they responded reasonably to the risk, even if the harm ultimately was not averted.”); Vandevender, 970 F.3d at 977 (plaintiff must show that defendants “unreasonably disregarded an objectively intolerable risk of harm.” (cleaned up) (quoting Farmer, 511 U.S. at 846)).

Wright’s “claims against the defendants in their official capacities, which are treated as claims against the municipality, fail for lack of a constitutional violation.” Morris v. Craddock, 954 F.3d 1055, 1060 (8th Cir. 2020). The judgment of the district court is affirmed. We thank appointed counsel for their work on this appeal.
