

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

ANTONIO LAMONT RICE

PLAINTIFF

v.

Case No. 4:26-CV-00553 KGB-JTK

**SGT. JEREMIAH BUCKNER, SGT. RYAN MATHIS
and DEPUTY A. TREMBLE**

DEFENDANTS

ANSWER

Come now the Pulaski County Defendants, Sgt. Jeremiah Buckner, Sgt. Ryan Mathis, and Deputy Anjelica Trimble, in their individual capacities only, and for their Answer to Plaintiff's Amended Complaint (Doc. No. 9), state the following:

1. As pleaded, the allegations of the Amended Complaint (Doc. No. 9) are denied.
2. The Defendants assert and reserve the right to file an amended Answer or other appropriate pleadings and to allege any affirmative defenses that might be available after a reasonable opportunity to investigate the allegations set forth in Plaintiff's Amended Complaint.
3. The Defendants specifically and expressly deny each and every allegation not specifically and expressly admitted in this Answer.
4. The Defendants respectfully join Plaintiff's demand for jury trial.

AFFIRMATIVE DEFENSES

5. The Defendants assert the following affirmative defenses:
 - A. All applicable immunity, including, but not limited to (and only as applicable), tort/negligence immunity, statutory tort/negligence immunity, punitive damages immunity, and sovereign immunity;
 - B. Qualified immunity;
 - C. Justification;

- D. Mootness;
- E. The Plaintiff has failed to state a claim upon which relief can be granted;
- F. Defendants avail themselves of all statute of limitations defenses applicable to this claim;
- G. Offset/Setoff;
- H. All defenses under the Prison Litigation Reform Act (P.L.R.A), 42 U.S.C. § 1997e, including, but not limited to the requirement for proof of a physical injury, the exhaustion of administrative remedies requirement, and the limitations on attorneys' fees; and
- I. Common defense doctrine, as applicable.

WHEREFORE, the Pulaski County Defendants, Sgt. Jeremiah Buckner, Sgt. Ryan Mathis, and Deputy Anjelica Trimble, in their individual capacities only, pray that the Plaintiff's Amended Complaint be dismissed, and for any and all other just and proper relief to which they are entitled.

Respectfully submitted,

SGT. JEREMIAH BUCKNER, SGT. MATHIS,
and DEPUTY ANJELICA TRIMBLE, in their
individual capacities only, Pulaski County
Defendants

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CERTIFICATE OF SERVICE

I hereby certify that on September 14, 2026, I presented the foregoing to the Clerk of the Court for filing and uploading to the CM/ECF system, and I mailed the document by United States Postal Service to the following non-CM/ECF participants:

Mr. Antonio Lamont Rice
#1028-26
Pulaski County Regional Detention Facility
3201 W. Roosevelt Road
Little Rock, AR 72204

/s/Melissa K. Dugger
Melissa K. Dugger, Bar No. 2017150
Attorney for Pulaski County Defendants