

IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS  
CIVIL DIVISION

UJIMA STEWART, in her capacity as Special Administrator  
of the Estate of Tauheed Raullerson, deceased

PLAINTIFF

vs. NO. 60CV-20-\_\_\_\_\_

THE BRIDGEWAY, LLC, EARNEST PEEPLES,  
TERRANCE THORNTON, MAURICE PHILLIPS,  
JOE WILLIAMS a/k/a JOEL WILLIAMS, JAMEEKA PIPPINS,  
BECKY NAEGLE

DEFENDANTS

**COMPLAINT**

Comes now the Plaintiff, Ujima Stewart, in her capacity as Special Administrator of the Estate of Tauheed Raullerson (sometimes referred to just as “Raullerson”), and for her cause of action against the Defendants, The Bridgeway, LLC, Earnest Peoples, Terrance Thornton, Maurice Phillips, Joe Williams a/k/a Joel Williams, Jameeka Pippins, and Becky Naegle, states:

1. Tauheed Raullerson was a male born on March 2, 1984 and who passed away on November 24, 2018.

2. Ujima Stewart is the duly appointed and acting Special Administrator of the Estate of Tauheed Raullerson. (See Exhibit A, attached hereto and incorporated herein by reference). Letters of Special Administrator have been issued to Ujima Stewart in connection with such appointment. (See Exhibit B, attached hereto and incorporated herein by reference).

3. The Bridgeway, LLC is an Arkansas Limited Liability Company. Its registered agent for service of process is Corporation Service Company, 300 Spring Building, Suite 900, 300 South Spring Street, Little Rock, AR 72201. The Bridgeway, LLC operates The BridgeWay, a

hospital at 21 Bridgeway Road, North Little Rock, AR. One of the services that it provides is in-patient treatment for adults with thought disorders.

4. Earnest Peoples is a mental health associate, who resides or did reside at the time of the events in issue at 817 Valerie, North Little Rock, AR. He was employed by The Bridgeway, LLC on November 24, 2018 and all of his acts and omissions set forth herein occurred within the scope of his employment by The Bridgeway, LLC.

5. Terrance Thornton is a registered nurse, who resides or did reside at the time of the events in issue at 5200 Hidden Meadows, Benton, AR. He was employed by The Bridgeway, LLC on November 24, 2018 and all of his acts and omissions set forth herein occurred within the scope of his employment by The Bridgeway, LLC.

6. Maurice Phillips is a mental health associate, who resides or did reside at the time of the events in issue at 2728 John Ashley, North Little Rock, AR. He was employed by The Bridgeway, LLC on November 24, 2018 and all of his acts and omissions set forth herein occurred within the scope of his employment by The Bridgeway, LLC.

7. Joe Williams a/k/a Joel Williams is a nursing supervisor, who resides or did reside at the time of the events in issue at 39 Pine, Greers Ferry, AR. He was employed by The Bridgeway, LLC on November 24, 2018 and all of his acts and omissions set forth herein occurred within the scope of his employment by The Bridgeway, LLC.

8. Jameeka Pippins is a mental health associate, who resides or did reside at the time of the events in issue at 5304 Keats Drive, Little Rock, AR. She was employed by The Bridgeway, LLC on November 24, 2018 and all of her acts and omissions set forth herein occurred within the scope of his employment by The Bridgeway, LLC.

9. Donna Dudley is a charge nurse who resides or did reside at the time of the events in issue at 6711 H Street, Little Rock, AR. She was employed by The Bridgeway, LLC on November 24, 2018 and all of her acts and omissions set forth herein occurred within the scope of his employment by The Bridgeway, LLC.

10. Becky Naegle is a registered nurse who resides or did reside at the time of the events 1109 Mellon Street, Little Rock, AR. She was employed by The Bridgeway, LLC on November 24, 2018 and all of her acts and omissions set forth herein occurred within the scope of his employment by The Bridgeway, LLC.

11. On November 23, 2018, Tauheed Raullerson presented as a patient at the Conway Regional Health System in Conway, Arkansas and was diagnosed with schizophrenia. He was subsequently transferred to The BridgeWay hospital on November 24, 2018 for treatment of thought disorders, including hearing voices. He was admitted as a patient into The BridgeWay.

12. Each of the individual defendants (for simplicity, this term “individual defendants” refers to all individuals named as defendants), was working in or near the unit where Tauheed Raullerson was hospitalized at The BridgeWay or the unit was accessible to such persons.

13. When a psychiatric evaluation of Tauheed Raullerson was performed after entry into The Bridgeway, Dr. Samuel Tyler Bayles or Dr. Susanna Shermer found that the capacity of Tauheed Raullerson to harm others was low. “Low” was the lowest category available. There was not a category of “none” that was responsive to the question.

14. Tauheed Raullerson had previously been taking the prescription drug Zyprexa but was travelling from California (where he lived) to Arkansas to see relatives and either left his medicine at home or the he had run out of the medicine. Zyprexa is a medicine used to treat and

control schizophrenia. When evaluated by Dr. Bayles, the Zyprexa was started again and actually a similar medication, Geodon, was given to Raullerson at the hospital in Conway.

15. At the beginning of the events set forth below, Tauheed Raullerson was near a nurses station desk, was calm, had his hands situated in a position demonstrating that he was not a threat to others, and at one time sat in a chair and was absolutely no threat. At the time, it appears that Raullerson was becoming agitated because one or more the individual defendants was crowding him rather than de-escalating the situation by assisting Raullerson back to his room.

16. Raullerson was confronted by all of the individual defendants and despite the fact that he was retreating, the situation was escalated by having more and more of the individual defendants confront him.

17. Just before the events leading to his death Raullerson was confronted by seven of the individual defendants. Raullerson became agitated when he was taken to the ground. For a period of six long minutes, from 8:13 PM to 8:19 PM on November 24, 2018, multiple individual defendants laid on top of Raullerson even though he was posing no threat to them at the time. No physical restraint devices were used to control the situation, only laying on top of or otherwise holding Raullerson to the floor.

18. The individual defendants had been advised by Dr. Bayles to administer the drug Ativan if Raullerson became unsafe. Although Raullerson's condition was very unsafe, the drug Ativan, which is used to quickly relieve anxiety, was never administered.

19. By 8:19 PM on November 24, 2018, Raullerson was dead. Personnel of The BridgeWay did not appear to start resuscitation efforts on Raullerson until 8:23 PM, but admittedly the video quality or camera position makes this task impossible.

20. Each of the individual defendants was negligent and their conduct was below the standard of care for an individual serving in the capacity in which they served in North Little Rock, Arkansas or a similar community in the following ways, among others:

- (i) the individuals did not properly control the situation;
- (ii) the individuals did not properly restrain Raullerson and only laid on top of him to restrain him;
- (iii) the individuals did not call Raullerson's physician when they began laying on top of Raullerson to obtain further direction and guidance;
- (iv) the individuals administered medication to Raullerson in violation of The BridgeWay's own policies and without Raullerson's informed consent;
- (v) the individuals did not administer the drug Ativan as prescribed by Raullerson's physician;
- (vi) the individuals escalated the situation by overcrowding and scaring Raullerson, rather than de-escalating the situation; and
- (vii) by failing to intervene and inform the other individual defendants that Raullerson was not combative and further efforts to lay on top of him should cease.

21. The conduct of the individual defendants is imputed to The Bridgeway, LLC. The Bridgeway, LLC was also negligent for a psychiatric hospital in North Little Rock, Arkansas or in a similar community in the following ways:

- (i) failing to train and supervise its employees in how to de-escalate a potentially violent encounter with a patient;
- (ii) failing to train and supervise its employees in the use of physical restraints;

- (iii) failing to train and supervise its employees regarding laying on top of patients for six minutes;
- (iv) failing to ensure the safety of Tauheed Raullerson while he was a patient;
- (v) failing to train and supervise its employees in the resuscitation of unresponsive patients; and
- (vi) in other ways.

22. As the proximate and actual result of the negligent restraint of Tauheed Raullerson, Raullerson was caused to die due to cardiac arrest and suffered pain, suffering, and emotional grief before his death, and his statutory wrongful death beneficiaries have suffered: mental anguish and emotional grief, funeral expenses, and are further entitled to recover for Raullerson's loss of life.

23. The damages suffered by Raullerson and statutory wrongful death beneficiaries as a result of the acts and omissions set forth herein are in an amount in excess of the minimum amount necessary to confer jurisdiction upon the United States District Court in a diversity of citizenship case.

WHEREFORE, the Plaintiff, Ujima Stewart, in her capacity as Special Administrator of the Estate of Tauheed Raullerson, prays judgment against the Defendants, and each of them, jointly and severally, in the sum and amount that the proof presented at the trial of this matter warrants, in an amount in excess of the minimum amount necessary to confer jurisdiction upon the United States District Court in a diversity of citizenship case, for costs, for attorneys fees to the extent permitted by law, and for such other relief as is just and proper.

Handwritten signature of Sam Sexton III in blue ink, with the number 14 written at the end.

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Sam Sexton, III (#87-157)  
Joey McCutchen (#88-045)  
McCutchen Sexton Napurano  
PO Box 1971  
Fort Smith, AR 72902  
Phone 479-783-0036  
Facsimile 479-783-5168  
[csexton@mccutchenlawfirm.com](mailto:csexton@mccutchenlawfirm.com)  
[jmccutchen@mccutchenlawfirm.com](mailto:jmccutchen@mccutchenlawfirm.com)

PLAINTIFF DEMANDS TRIAL BY JURY

IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS  
PROBATE DIVISION

IN THE MATTER OF THE ESTATE OF  
TAUHEED RASHAD RAULLERSON, DECEASED

CASE NO. 60PR-2019-2697

**ORDER FOR APPOINTMENT OF  
SPECIAL ADMINISTRATOR**

On this date on the file stamp above, comes before the Court the Petition for Appointment of Special Administrator. Based upon all matters properly before the Court, the Court finds and orders as follows:

1. The decedent was a male born March 2, 1984 and who passed away on November 24, 2018 in Little Rock, Arkansas.
2. The decedent was the brother of the Petitioner Ujima Stewart.
3. Pursuant to Ark. Code Ann. § 28-48-103 and any other applicable statute, Ujima Stewart (herein "Petitioner") is appointed Special Administrator of the Estate of Tauheed Rashad Raullerson. The Special Administrator shall be appointed for the purpose of retaining counsel and pursuing claims for wrongful death of Tauheed Rashad Raullerson as well as all claims that may be asserted on behalf of Tauheed Rashad Raullerson for injuries, pain, suffering, emotional harm, and other damages and harm sustained prior to his death, and all claims for damages recoverable under the Arkansas Wrongful Death Act and under any other law or based upon any other cause of action, as well as performing any other act required to pursue such causes of action.
4. Petitioner has appointed Sam Sexton, III, Attorney at Law, PO Box 1971, Fort Smith, AR 72902 as her agent for service of process in this matter.
5. Petitioner is ordered to receive the approval of this Court with respect to: (i) any settlement offers that the Petitioner, on behalf of the Estate of Tauheed Rashad Raullerson, decides

**EXHIBIT  
A**

to tentatively accept: (ii) the distribution of any settlement proceeds; (iii) requiring that any funds obtained by judgment shall not be distributed without a further Order of this Court; and (iv) requiring that no funds shall pass through the hands of Petitioner without an Order of this Court. Therefore, any requirement of bond being posted by Petitioner, if such requirement statutorily exists, is waived. No bond shall be required as a prerequisite to file any cause of action to pursue the duties which he requests herein.

IT IS SO ORDERED.



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Honorable H. Vann Smith  
Circuit Judge

1-2-2020

Prepared by:  
Sam Sexton

IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS  
PROBATE DIVISION

No. 60PR-19-2697

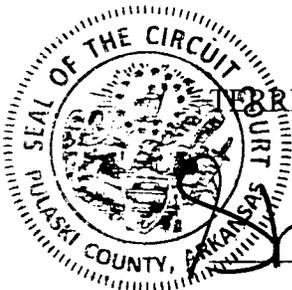
IN THE MATTER OF THE ESTATE OF TAUHEED RASHAD RAULLERSON,  
Deceased

**LETTER OF SPECIAL ADMINISTRATION**

UJIMA STEWART, whose address is 1108 North 5th Street, Fort Smith, AR 72901, having been appointed and qualified as Special Administratrix of the estate of TAUHEED RASHAD RAULLERSON, who died on or about November 24, 2018 is hereby authorized to act as Special Administratrix for and on behalf of the estate and to take possession of the estate's property as authorized by law. Special Administratrix on behalf of the deceased TAUHEED RASHAD RAULLERSON for injuries, pain, suffering, emotional harm, and other damages and harm sustained prior to his death, and all claims for damages recoverable under the Arkansas Wrongful Death Act and under any other law or based upon any other cause of action, as well as performing any other act required to pursue such causes of action.

ISSUED this date: 29-JUL-2020

TERRI HOLLINGSWORTH, CIRCUIT CLERK



*Shamkia M. Patrick*

By: Shamkia M. Patrick, Pulaski County Clerk

**EXHIBIT  
B**