

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
WINCHESTER DIVISION

SHANE CARGILE,)
)
 Plaintiff,)
)
 v.) No. 4:24-cv-18-MJD
)
 ISAAC MEEKS,)
)
 Defendant.)
)

FINAL PRETRIAL ORDER

This matter having come before the Court on January 13, 2026, at a status conference pursuant to Federal Rule of Civil Procedure 16, and Drew Justice having appeared as counsel for Plaintiff, and Jeffrey Thompson and Grant Carringer having appeared as counsel for Defendants, the following action was taken:

(1) Jurisdiction: This is an action for violation of civil rights under color of law. Jurisdiction of the Court is invoked pursuant to 42 U.S.C. § 1983. The jurisdiction of the Court is not disputed.

(2) General Nature of the Claims of the Parties:

(a) Stipulated Facts:

On February 19, 2023, Plaintiff Shane Cargile was a pretrial detainee at the Coffee County Jail.

On February 19, 2023, Officer Issac Meeks was a Coffee County Sheriff's Officer working at the Coffee County Jail.

(b) Plaintiffs' Theory:

Plaintiff Shane Cargile contends Coffee County Sheriff's Officer Isaac Meeks used excessive force against him, a jail inmate, by taking him to the ground and biting him. While Shane Cargile was trying to go speak with a superior officer to complain about Isaac Meeks's conduct, Meeks grabbed him and slung him to the ground near a railing that would have plunged him to the second floor. Once he was on top of Cargile, Meeks began trying to bite him and, after Cargile was handcuffed, ultimately succeeded. As a result of the biting, the inmate suffered pain and numbness, emotional distress, and physical scarring.

(c) Defendant's Theory:

On February 19, 2023, Coffee County Sheriff's Officer Issac Meeks was distributing new blankets and bedsheets to inmates in the BD pod of the jail who did not already have them. Officer Meeks was distributing to the cells on the upper tier of the pod. Plaintiff Shane Cargile, an inmate, did not receive a new sheet because he already possessed one. Upset by this, Cargile became disorderly, cursing at Officer Meeks and speaking loudly. Officer Meeks informed Carile that his behavior warranted a 24-hour lockdown for disrespect and secured him in his cell, BD-206. While continuing his duties, Officer Meeks observed that Cargile had exited his cell, in direct violation of the lockdown order. Officer Meeks asked and ordered Cargile to return to his cell and remain secured, but Cargile refused, responding with profanity. To enforce the lockdown order, Officer Meeks attempted to guide Cargile to the ground for restraint, but slipped and fell. Cargile then placed Officer Meeks in a rear naked chokehold, a maneuver considered deadly force, and struck Meeks in the mouth, causing bruising swelling to his mouth. With the assistance of another officer, Officer Meeks escaped the chokehold and regained control. Cargile was handcuffed and escorted back to his cell.

Defendant Issac Meeks denies using excessive force against Plaintiff Shane Carile and asserts that no constitutional violation occurred. Officer Meeks further denies Plaintiff sustained any actual harm as a result of Officer Meeks's actions.

(3) **Contested Issues of Law:**

(a) Whether Defendant Issac Meeks is liable for a violation of the Fourteenth Amendment under 42 U.S.C. § 1983 for use of excessive force.

(b) Whether Defendant Issac Meeks is entitled to qualified immunity.

(c) Whether Plaintiff sustained any compensatory damages.

(d) Whether Plaintiff is entitled to nominal damages.

(e) Whether Plaintiff is entitled to punitive damages.

(f) Whether the prevailing party is entitled to attorney's fees.

(4) **Exhibits:** The parties have disclosed all exhibits in accordance with Federal Rule of Civil Procedure 26(a)(3)(A). All exhibits to be introduced have been pre-marked in such a way as to allow the Court to determine which party is offering them. The parties have prepared a joint list of exhibits in a chart form that will allow the Court to track whether an exhibit is introduced and/or

admitted with/without objection. Authenticity is stipulated by the parties for all exhibits. The parties have endeavored to stipulate the admissibility of all exhibits.

The parties agree to the authenticity **and** admissibility of the following exhibits:

Exhibit #	Brief Description
1	Photos of Shane Cargile
6	Cargile CCSD's Disciplinary Appeal Form Dated February 23, 2023
7	February 19, 2023 Pod Video 1
8	February 19, 2023 Pod Video 2
9	February 19, 2023 Disciplinary Recording
10	Photograph of Meeks
19	Cargile Grievance History
20	Cargile Text History
21	February 19, 2023 Pod Video 1 (Zoomed in Close)
22	February 19, 2023 Pod Video 1 (Slow Motion)
23	February 19, 2023 Pod Video 1 (Magnified)
26	June 15, 2025 conviction of theft of property \$10,000-\$60,000 – Redacted
30	QCHC Medical Records – Redacted

The parties agree to the authenticity **but not** the admissibility of the following exhibits:

Exhibit #	Brief Description	Admitted?	Objection	Response	Defendant's additional response
2	Feb. 19, 2023 Incident Report		802	<p><u>Hearsay Exception:</u> FRE 803(6) (Business Records); FRE 803(8) (Public Records).</p> <p><u>Why Exception Applies:</u> Prepared at or near the time in the ordinary course of the jail's operations by personnel with duty to report use-of-force incidents. Contains factual observations of staff regarding the incident at issue, not investigative conclusions aimed at litigation.</p>	<p><u>Foundation to Be Laid:</u> Testimony from the records custodian</p> <p><u>Probative vs. Prejudice:</u> Highly probative of the sequence of events, force used, inmate resistance, and injuries. Minimal prejudice—it's the official record of the very incident being tried and does not include inflammatory or unrelated material.</p>

				Meets reliability factors of 803(6)/(8).	FRE 403 favors admission.
3	Feb 19, 2023 Disciplinary Hearing Decision		402, 403, 602, 802	<p><u>Hearsay Exception:</u> FRE 803(6) (Business Records); FRE 803(8) (Public Records).</p> <p><u>Why Exception Applies:</u> The disciplinary record is created as a routine, mandatory jail procedure. It reflects observations and statements recorded in the ordinary course, and is not generated for litigation. Reliability satisfies 803(6)/(8). Relevance arises from its direct connection to the events and conduct in dispute. Rule 404(b) not implicated.</p>	<p><u>Foundation to Be Laid:</u> Testimony from the records custodian</p> <p><u>Probative vs. Prejudice:</u> Probative of Plaintiff's noncompliance, resistance, and conduct during the exact incident at issue. Any prejudice is nonexistent to very minimal because the record concerns the same event at issue. FRE 403 favors admission.</p>
4	Feb. 19, 2023 Rule Violation Notice		402, 403, 602, 802	<p><u>Hearsay Exception:</u> FRE 803(6) (Business Records); FRE 803(8) (Public Records).</p> <p><u>Why Exception Applies:</u> The Notice is a routine, contemporaneous record created in the ordinary course of jail operations whenever an inmate violates rules. Reliability meets 803(6)/(8). Relevance derives from its direct</p>	<p><u>Foundation to Be Laid:</u> Testimony from the records custodian</p> <p><u>Probative vs. Prejudice:</u> Probative of Plaintiff's noncompliance, resistance, and conduct during the exact incident at issue. Any prejudice is nonexistent to very minimal because the record concerns the same</p>

				description of the disputed event.	event at issue. FRE 403 favors admission.
5	Feb. 19, 2023 Disciplinary Hearing Appeal Decision		402, 403, 602, 802	<p><u>Hearsay Exception:</u> FRE 803(6) (Business Records); FRE 803(8) (Public Records).</p> <p><u>Why Exception Applies:</u> The appeal decision is part of the jail's routine disciplinary process, created in the ordinary course and reflecting the jail's administrative review of the rule violation arising from this exact incident. It is a regularly kept record made by officials acting under a legal duty to document appeal outcomes. Reliability fits 803(6)/(8). Its relevance flows directly from its assessment of Plaintiff's conduct during the incident.</p>	<p><u>Foundation to Be Laid:</u> Testimony from the records custodian</p> <p><u>Probative vs. Prejudice:</u> Probative of Plaintiff's noncompliance, resistance, and conduct during the exact incident at issue. Any prejudice is nonexistent to very minimal because the record concerns the same event at issue. FRE 403 favors admission.</p>
11	Feb. 19, 2023 OPA Report		402, 403, 602, 802	<p><u>Hearsay Exception:</u> FRE 803(6) (Business Records); FRE 803(8) (Public Records).</p> <p><u>Why Exception Applies:</u> OPA reports are created pursuant to mandatory internal-affairs procedures, at or near the time of the incident, by officials with a legal duty to</p>	<p><u>Foundation to Be Laid:</u> Testimony from the records custodian</p> <p><u>Probative vs. Prejudice:</u> Probative of a neutral, contemporaneous governmental assessment of what occurred—use of force, inmate resistance,</p>

				investigate and document use-of-force events. This report concerns only the incident at issue, not unrelated conduct. It is a regularly kept governmental record meeting 803(6)/(8) reliability requirements. Relevance arises from its factual account and findings regarding Plaintiff's and the officer's conduct.	and officer injuries. Minimal prejudice because it addresses only the same incident, not propensity or other misconduct. FRE 403 favors admission.
12	Dec. 9, 2022 Incident Report (Case No. 2644)		402, 403, 404, 802	<p><u>Hearsay Exception:</u> FRE 803(6) (Business Records); FRE 803(8) (Public Records).</p> <p><u>Applicable 404(b) Use:</u> Offered not for propensity, but for intent, plan, and absence of mistake regarding Plaintiff's alleged fabrication of events in correctional encounters.</p> <p><u>Why Exceptions Apply:</u> The report documents a prior, similar incident in which Plaintiff engaged in misrepresentation during a cell-entry event, making it probative of a pattern of falsifying circumstances, which bears directly on intent and absence of mistake</p>	<p><u>Foundation to Be Laid:</u> Testimony from the records custodian</p> <p><u>Probative vs. Prejudice:</u> Probative of Plaintiff's credibility, intent, and whether his current allegation is fabricated or mistaken. Any prejudice is limited by the fact that it is not offered to show propensity, but to rebut his narrative and credibility on the core issue. FRE 403 favors admission.</p>

				in his present allegation that the officer bit him.	
13	December 16, 2022 Disciplinary Recording 1		402, 403, 404, 802	<p><u>Hearsay Exception:</u> FRE 803(6) (Business Records); FRE 803(8) (Public Records).</p> <p><u>Applicable 404(b) Use:</u> Offered not for propensity, but for intent, plan, and absence of mistake regarding Plaintiff's alleged fabrication of events in correctional encounters.</p> <p><u>Why Exceptions Apply:</u> The recording documents Plaintiff's conduct and statements during a prior, similar cell-entry incident, in which he engaged in misrepresentation. It is relevant to whether his current claim (alleged bite) reflects a deliberate pattern rather than an accidental or mistaken perception.</p>	<p><u>Foundation to Be Laid:</u> Testimony from the records custodian</p> <p><u>Probative vs. Prejudice:</u> Probative of Plaintiff's credibility, intent, and whether his current allegation is fabricated or mistaken. Any prejudice is limited by the fact that it is not offered to show propensity, but to rebut his narrative and credibility on the core issue. FRE 403 favors admission.</p>
14	December 16, 2022 Disciplinary Recording 2		402, 403, 404, 802	<p><u>Hearsay Exception:</u> FRE 803(6) (Business Records); FRE 803(8) (Public Records).</p> <p><u>Applicable 404(b) Use:</u> See above response to proposed Exhibit 13, the 12/16/2022 recording #1.</p>	<p><u>Foundation to Be Laid:</u> Testimony from the records custodian</p> <p><u>Probative vs. Prejudice:</u> See above response to proposed Exhibit</p>

				<p><u>Why Exceptions Apply:</u> See above response to proposed Exhibit 13, the 12/16/2022 recording #1.</p>	13, the 12/16/2022 recording #1.
15	CCSD's Disciplinary Hearing Decision (Case No. 2644)		402, 403, 404, 602, 802	<p><u>Hearsay Exception:</u> FRE 803(6) (Business Records); FRE 803(8) (Public Records).</p> <p><u>Applicable 404(b) Use:</u> Not offered to show propensity. Offered for intent, plan, and absence of mistake regarding Plaintiff's alleged fabrication or manipulation of events during correctional encounters.</p> <p><u>Why Exceptions Apply:</u> The disciplinary decision is a routine, mandatory jail record documenting findings from a prior, similar incident where Plaintiff engaged in misrepresentation or falsification. This makes it probative of whether his current "bite" allegation is intentional fabrication rather than mistake or misunderstanding.</p>	<p><u>Foundation to Be Laid:</u> Testimony from the records custodian</p> <p><u>Probative vs. Prejudice:</u> Probative of Plaintiff's credibility, intent, and the absence of mistake concerning his current allegation. Any prejudice is limited because it is not offered for character, but for 404(b) non-propensity purposes. FRE 403 favors admission.</p>
16	CCSD's Inmate Rule Violation		402, 403, 404, 602, 802	<p><u>Hearsay Exception:</u> FRE 803(6) (Business Records);</p>	<u>Foundation to Be Laid:</u>

	Notice (Case No. 2644)			<p>FRE 803(8) (Public Records).</p> <p><u>Applicable 404(b)</u> <u>Use:</u> See above response to proposed Exhibit 15, Case No. 2644 Disciplinary Hearing Decision.</p> <p><u>Why Exceptions</u> <u>Apply:</u> See above response to proposed Exhibit 15, Case No. 2644 Disciplinary Hearing Decision.</p>	<p>Testimony from the records custodian</p> <p><u>Probative vs. Prejudice:</u> See above response to proposed Exhibit 15, Case No. 2644 Disciplinary Hearing Decision.</p>
17	CCSD's Disciplinary Hearing Appeal Decision (Case No. 2644)		402, 403, 404, 602, 802	<p><u>Hearsay Exception:</u> FRE 803(6) (Business Records); FRE 803(8) (Public Records).</p> <p><u>Applicable 404(b)</u> <u>Use:</u> See above response to proposed Exhibit 15, Case No. 2644 Disciplinary Hearing Decision.</p> <p><u>Why Exceptions</u> <u>Apply:</u> See above response to proposed Exhibit 15, Case No. 2644 Disciplinary Hearing Decision.</p>	<p><u>Foundation to Be Laid:</u> Testimony from the records custodian</p> <p><u>Probative vs. Prejudice:</u> See above response to proposed Exhibit 15, Case No. 2644 Disciplinary Hearing Decision.</p>
18	Cargile CCSD's Disciplinary Appeal Form Dated December 16, 2022		402, 403, 404, 802	<p><u>Hearsay Exception:</u> FRE 803(6) (Business Records); FRE 803(8) (Public Records).</p> <p><u>Applicable 404(b)</u> <u>Use:</u> See above response to proposed Exhibit 15, Case No. 2644</p>	<p><u>Foundation to Be Laid:</u> Testimony from the records custodian</p> <p><u>Probative vs. Prejudice:</u> See above response to proposed Exhibit 15, Case No. 2644</p>

				Disciplinary Hearing Decision. <u>Why Exceptions Apply:</u> See above response to proposed Exhibit 15, Case No. 2644 Disciplinary Hearing Decision.	Disciplinary Hearing Decision.
24	October 9, 2013 entry of judgment for theft over \$1,000 – Redacted		404, 609	<u>Applicable 404(b) Use:</u> Not offered under 404(b). Offered solely under FRE 609(a)(1)(A). <u>Why Exception Applies:</u> A felony theft conviction is admissible for impeachment because it was punishable by more than one year, and theft is a crime involving dishonesty, directly bearing on Plaintiff's veracity. The judgment itself is expressly admissible under 803(22).	<u>Foundation to Be Laid:</u> Certified judgment; testimony from the records custodian, police officers, correctional officers, Defendant, and/or Plaintiff <u>Probative vs. Prejudice:</u> High probative value regarding Plaintiff's truthfulness. The risk of prejudice is minimal because the evidence is offered solely for credibility under Rule 609, not to prove propensity or conduct in conformity. FRE 403 does not outweigh admission.
25	June 18, 2025 conviction for theft of property of \$2,500-10,000 – Redacted		404, 609	<u>Applicable 404(b) Use:</u> Not offered under 404(b). Offered solely under FRE 609(a)(1)(A). <u>Why Exception Applies:</u> See above response to proposed Exhibit	<u>Foundation to Be Laid:</u> Certified judgment; testimony from the records custodian, police officers, correctional officers, Defendant, and/or Plaintiff

				24, the 10/09/2013 judgment	<u>Probative vs. Prejudice:</u> See above response to proposed Exhibit 24, the 10/09/2013 judgment
27	August 15, 2011 conviction for assault		404, 609	<p><u>Applicable 404(b) Use:</u> Not offered under 404(b); not offered to show propensity.</p> <p><u>Why Exception Applies:</u> Offered solely under FRE 609(a)(1)(A) because the assault conviction was punishable by more than one year. Although not a crime of dishonesty, it is admissible for general impeachment subject to Rule 403 balancing. Not offered for any substantive purpose.</p>	<p><u>Foundation to Be Laid:</u> Certified judgment; testimony from the records custodian, police officers, correctional officers, Defendant, and/or Plaintiff</p> <p><u>Probative vs. Prejudice:</u> Probative for general credibility under 609(a)(1). Prejudice is limited because the conviction is used solely for impeachment and not to show violent propensity or conformity under 404(b). Any 403 concerns do not substantially outweigh its impeachment value.</p>
28	June 22, 2011 conviction for burglary of a motor vehicle – Redacted		404, 609	<p><u>Applicable 404(b) Use:</u> Not offered under 404(b). Offered solely under FRE 609(a)(1)(A).</p> <p><u>Why Exception Applies:</u> See above response to proposed Exhibit</p>	<p><u>Foundation to Be Laid:</u> Certified judgment; testimony from the records custodian, police officers, correctional officers, Defendant, and/or Plaintiff</p>

				24, the 10/09/2013 judgment	<u>Probative vs. Prejudice:</u> See above response to proposed Exhibit 24, the 10/09/2013 judgment
29	June 22, 2011 conviction for theft over \$1,000 – Redacted		404, 609	<u>Applicable 404(b) Use:</u> Not offered under 404(b). Offered solely under FRE 609(a)(1)(A). <u>Why Exception Applies:</u> See above response to proposed Exhibit 24, the 10/09/2013 judgment	<u>Foundation to Be Laid:</u> Certified judgment; testimony from the records custodian, police officers, correctional officers, Defendant, and/or Plaintiff <u>Probative vs. Prejudice:</u> See above response to proposed Exhibit 24, the 10/09/2013 judgment

(5) **Witnesses:** The parties have disclosed all witnesses in accordance with Federal Rule of Civil Procedure 26(a)(3)(A). A list comprised of the names of all witnesses and their addresses and telephone numbers is as follows:

(a) List for Plaintiff:

1. Shane Cargile, Plaintiff
c/o Drew Justice
2. Peyton McLaughlin
478 Radio Beam Ln, Tullahoma, TN 37388
(931-588-1012)
3. Isaac Meeks, Defendant
c/o Jeffrey Thompson
4. Any needed records custodians
5. Any witness on Defendant's witness list

(b) List for Defendant:

1. Defendant Issac Meeks
c/o Jeffrey R. Thompson
2. Officer Christian Reese
c/o Jeffrey R. Thompson
3. Officer Mike Reed
c/o Jeffrey R. Thompson
4. Officer Tristan Collins
c/o Jeffrey R. Thompson
5. Plaintiff Shane Cargile in person and via his
deposition c/o Drew Justice
6. Lt. Daniel Ray
c/o Jeffrey R. Thompson
7. Scott Barlow
3326 Choptank Road
Preston, Maryland 21655
(410) 463-5766
8. Officer Chelsea Corrozzo
c/o Jeffrey R. Thompson
9. Officer Jessie George
c/o Jeffrey R. Thompson
10. Officer Jacob Nettles
c/o Jeffrey R. Thompson
11. Lt. Tammy Warren
c/o Jeffrey R. Thompson
12. Chief Frank Watkins
c/o Jeffrey R. Thompson
13. Brittany Smtih, RN
Quality Correctional Healthcare
76 County Jail Lane
Manchester, TN 37355
(931) 728-3591

14. Carolyn Dunn, LPN
Quality Correctional Healthcare
76 County Jail Lane
Manchester, TN 37355
(931) 728-3591
15. Mary Cade, LPN
Quality Correctional Healthcare
76 County Jail Lane
Manchester, TN 37355
(931) 728-3591
16. Any person on Plaintiff's witness list
17. Any person on Plaintiff's initial disclosures
18. Any person identified in Defendant's initial disclosures
19. Any person identified in Plaintiff's responses to written discovery
20. Any person identified in Defendant's responses to written discovery
21. Any witness necessary for impeachment
22. Any witness necessary for rebuttal

- (6) **Other Matters:** This case is set for trial before the United States Magistrate Judge and a jury at 9:00 a.m. [Eastern] on January 20, 2026 in the Chattanooga Division. Counsel shall be present at 8:30 a.m. [Eastern] on the first day of trial to take up any preliminary matters. The probable length of trial is 3 days. The parties shall be prepared for trial on the date which has been assigned. The parties demand a jury to try this matter.
- (7) This final pretrial order shall supplant the pleadings.

APPROVED FOR ENTRY:

/s/ 
MIKE DUMITRU
UNITED STATES MAGISTRATE JUDGE

APPROVED AS TO FORM AND SUBSTANCE:

/s/ Jeff R. Thompson

Jeff R. Thompson (BPR #020310)
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