

**IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS  
CIVIL DIVISION**

**ARKANSAS CHILDREN’S HOSPITAL**

**PLAINTIFF**

**V. CASE NO. \_\_\_\_\_**

**PAULINA CASILLAS;  
DEZEIOUN CRUDUP**

**DEFENDANTS**

**EX PARTE PETITION FOR TEMPORARY RESTRAINING ORDER**

Plaintiff Arkansas Children’s Hospital (“ACH”), by and through undersigned counsel, for its Ex Parte Petition for Temporary Restraining Order against Paulina Casillas and Dezeioun Crudup (“Defendants”), and states as follows:

**NATURE OF THE CASE**

1. ACH is a children’s hospital in Little Rock, Arkansas that provides medical care and other services to children through the thousands of medical professionals and staff members it employs. This lawsuit arises from Defendant Crudup’s repeated, unprovoked threats to ACH employees and Defendant Casillas’ repeated, unprovoked threats and attack on an ACH employee on August 27, 2024.

2. Pursuant to Rule 65 of the Arkansas Rules of Civil Procedure and Ark. Code Ann. § 11-5-115, ACH requests that the Court issue an ex parte temporary restraining order enjoining Defendants from visiting the premises of ACH and assaulting, or otherwise interfering with, ACH operations or its employees or invitees.

**PARTIES, JURISDICTION, VENUE**

3. ACH is an Arkansas nonprofit corporation with its principal place of business at 1 Children’s Way, Little Rock, Arkansas 72202.

4. Upon information and belief, Defendant Crudup is a citizen and resident of North Little Rock, Arkansas. He is the father of a minor patient receiving treatment at ACH.

5. Upon information and belief, Defendant Casillas is a citizen and resident of North Little Rock, Arkansas. She is the mother of a minor patient receiving treatment at ACH.

6. This Court has both subject matter and personal jurisdiction over this matter and the parties pursuant to Ark. Code Ann. § 11-5-115.

7. Venue is proper in this Court.

8. ACH moves this Court for a temporary restraining order against Defendants to protect the life, health, safety, and welfare of its employees pursuant to Ark. Code Ann. § 11-5-115, which provides in pertinent part as follows:

If an employer or an employer's employee or invitee has . . . (2) [r]eceived a threat of violence by an individual which can reasonably be construed as a threat which may be carried out at the work site as defined by § 5-13-301, terroristic threatening; § 5-38-202, threatening a catastrophe; §§ 5-13-204--5-13-207, assault; or §§ 5-26-304--5-26-306, domestic battering . . . (3) . . . the employer may, in addition to, or instead of, filing criminal charges against the individual, seek a temporary restraining order, a preliminary injunction, or an injunction under Arkansas Rule of Civil Procedure 65 prohibiting further unlawful acts by that individual at the work site, which shall include any place at which work is being performed on behalf of the employer.

Ark. Code Ann. § 11-5-115(a) (emphasis added).

### STATEMENT OF FACTS

9. Defendants are the parents of a child receiving medical treatment at ACH. The child has been a patient at ACH since he was first admitted following his birth on or about January 1, 2023, and there is no scheduled discharge date. A true and correct copy of the Affidavit of Brent Thompson is attached hereto and incorporated herein as **Exhibit 1**.

10. Defendants have repeatedly jeopardized the life, health, safety, and welfare of ACH and its employees. *Id.*

11. On June 29, 2024, Defendant Crudup made repeated threats toward ACH employees. A true and correct copy of the June 29, 2024 Security Department Incident Report is attached here to and incorporated herein as **Exhibit 2**. *See also* Exhibit 1.

12. Specifically, Defendant Crudup threatened to physically harm the assigned physician because he disagreed with the care provided to the patient. *See* Exhibits 1, 2. Defendant Casillas was also present during this altercation and engaged in making threats to the ACH employees present. *Id.*

13. Defendants refused to stop making threats and interact with ACH employees in a calm, safe manner. *Id.*

14. The situation escalated in a manner that warranted a call to the ACH Security Department. *Id.* Two security officers arrived at the patient's room and escorted Defendants to their vehicle in the ACH parking lot. *Id.*

15. Defendant Crudup was thereafter restricted from ACH property. *Id.*

16. Defendant Casillas was permitted to continue entering ACH property to visit the patient. *See* Exhibit 1.

17. However, on August 27, 2024, Defendant Casillas attacked Aprille Davis, a nurse employed by ACH who was assigned to the patient. A true and correct copy of the August 27, 2024 Security Department Incident Report is attached hereto and incorporated herein as **Exhibit 3**. *See also* Exhibit 1.

18. On or around the morning of August 27, 2024, while Defendant Castillas was visiting the patient at ACH, the patient coded and was resuscitated. *See* Exhibits 2, 3. This was not an uncommon occurrence given the patient's complicated medical condition. *Id.*

19. During and immediately following those events, the ACH employees assigned to the patient propped open the door to the patient's room, turned all lights on, and opened the curtains to ensure access to the patient was not hindered in any way and that the room was sufficiently well-lit. *See Exhibits 1, 3.*

20. Defendant Casillas disagreed with this decision made by ACH employees and began verbally assaulting Nurse Davis and other ACH employees in the vicinity. *Id.*

21. Defendant Casillas then physically attacked Nurse Davis by grabbing Nurse Davis by the hair, ramming her head into a door, ramming her head into a table, and forcibly shaking her. *Id.*

22. An ACH employee tried to remove Defendant Casillas from Nurse Davis, but they were unable to do so. A true and correct copy of the Police Report is attached hereto and incorporated herein as **Exhibit 4**. *See also Exhibit 1.*

23. Two additional employees joined in the effort and Defendant Casillas was eventually pulled away from Nurse Davis. *See Exhibits 1, 4.*

24. An ACH employee sounded the panic alarm and officers from the ACH Security Department were dispatched. *Id.*

25. The Little Rock Police Department was likewise called to the scene and arrived approximately 30 minutes after the attack occurred. *See Exhibits 1, 4.*

26. The security officers removed Defendant Casillas from Nurse Davis and held her in a separate room until police officers from the Little Rock Police Department began their investigation. *See Exhibits 1, 4.*

27. Nurse Davis had visible injuries on her face, neck, and back from Defendant Casillas's physical attack. *See Exhibits 1, 4.*

28. Defendant Casillas was subsequently arrested and charged with battery in the 2nd degree and terroristic threatening in the 2nd degree. *See* Exhibit 4. Criminal proceedings against Defendant Casillas are ongoing. *See* Exhibit 1.

### **CLAIM FOR RELIEF**

29. ACH realleges and incorporates all preceding allegations contained herein.

30. Pursuant to Rule 65 of the Arkansas Rules of Civil Procedure, ACH moves the Court for an ex parte temporary restraining order. Taken as a whole, a temporary restraining order is necessary because ACH will suffer immediate and irreparable injury inasmuch as Nurse Davis and other ACH employees have received threats of violence, as defined by Ark. Code Ann. § 5-13-301, from both Defendants against ACH's employees and property.

31. Proof of such threats has been established by a preponderance of the evidence. Ark. Code Ann. § 11-5-115(b)(1).

32. Pursuant to Ark. R. Civ. P. 65(b)(1)(B), undersigned counsel hereby certifies that no efforts of prior notice have been undertaken regarding this Petition and that prior notice of this Petition to Defendants should not be required, as Defendants have shown a willingness and desire to cause harm to ACH and its employees, and these matters require the emergency attention of this Court. ACH's counsel will attempt to serve a copy of this Petition on Defendants contemporaneously with this filing.

33. ACH requests that a hearing on this Petition be set for hearing at the earliest possible time pursuant to Ark. R. Civ. P. 65(b)(3).

34. ACH requests that this Court dispense with the security requirement for the temporary restraining order, as there will be no "costs and damages sustained by any party found to have been wrongfully enjoined or restrained." Ark. R. Civ. P. 65(b)(4).

35. This Petition is made in good faith and in the public's interest.

36. ACH respectfully requests that this Court enter an ex parte temporary restraining order pursuant to § 11-5-115(d), with statewide validity, prohibiting Defendants Casillas and Crudup from:

- a. Entering any property owned, leased, or operated by ACH, including but not limited to 1 Children's Way, Little Rock, Arkansas 72202;
- b. Assaulting, or otherwise interfering with ACH, ACH operations, or ACH's employees or invitees at ACH's place(s) of business, including but not limited to 1 Children's Way, Little Rock, Arkansas 72202;
- c. Abusing or injuring ACH's employees, invitees, or property at ACH's place(s) of business, including but not limited to 1 Children's Way, Little Rock, Arkansas 72202;
- d. Contacting ACH, ACH employees, or ACH's invitees by phone, text message, or email at any ACH's place(s) of business, including but not limited to 1 Children's Way, Little Rock, Arkansas 72202, for any purpose other than discussing the health, treatment, care, or condition of the patient; and
- e. Assaulting, contacting, abusing, injuring, or interfering with ACH's employees at their private residences.

**WHEREFORE**, Arkansas Children's Hospital respectfully requests that this Court enter a Temporary Restraining Order against Defendants Paulina Casillas and Dezeioun Crudup, pursuant to Ark. Code Ann. § 11-5-115, and for all other just and proper relief.

Respectfully submitted,

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*/s/ David S. Mitchell, Jr.*

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**VERIFICATION**

STATE OF ARKANSAS    )

)

COUNTY OF PULASKI    )

I, Brent Thompson state upon oath that I have read the statements contained in the foregoing pleading and they are true and correct to the best of my knowledge and belief.



Brent Thompson  
Arkansas Children's Hospital Executive Vice President/Chief Legal Officer

Dated: 8/29/2024