

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
TENNESSEE

Sigifredo Molina Varela v. Warden Harrison

Varela · No. 2:24-cv-02587-MSN-atc · Decided February 18, 2026

SUMMARY

The United States District Court for the Western District of Tennessee granted the respondent’s motion to dismiss a federal prisoner’s 28 U.S.C. § 2241 petition challenging the Bureau of Prisons’ treatment of First Step Act earned time credits. The court dismissed the petition as moot because the petitioner had completed his custodial sentence and been released from Bureau of Prisons custody. The court also certified that an appeal would not be taken in good faith and denied leave to proceed in forma pauperis on appeal.

CASE DETAILS

COURT	United States District Court for the Western District of Tennessee
WRITING FOR THE COURT	Mark S. Norris
JURISDICTION	United States District Court for the Western District of Tennessee
DECIDED	February 18, 2026
DOCKET	2:24-cv-02587-MSN-atc
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner sought habeas relief under 28 U.S.C. § 2241 challenging the Bureau of Prisons' determination that he was ineligible for First Step Act earned time credits. The respondent moved to dismiss under Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6). After petitioner was released from custody, the court granted the motion and dismissed the petition as moot.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded allegations as true and construes the record in the light most favorable to the nonmoving party; dismissal requires failure to state a plausible claim for relief. Article III mootness is jurisdictional, and a prisoner whose sentence has expired must show a concrete collateral consequence to maintain the claim.
PRECEDENTIAL VALUE	nonprecedential

PARTIES

Sigifredo Molina Varela v. Warden Harrison

TOPICS

federal habeas corpus

mootness

motions to dismiss

appellate procedure

statutory interpretation

PRACTICE AREAS

federal habeas corpus

post-conviction relief

civil procedure

appellate procedure

QUESTIONS PRESENTED

1. Whether Varela's § 2241 petition became moot after he completed his custodial sentence and was released from Bureau of Prisons custody.
2. Whether the court should grant the respondent's motion to dismiss under Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6).
3. Whether any appeal should be certified as not taken in good faith and whether Varela should be denied leave to proceed in forma pauperis on appeal.

HOLDINGS

1. A § 2241 petition seeking First Step Act earned time credits against custodial time is moot when the petitioner completes his custodial sentence and is released, absent a showing of a concrete collateral consequence. Because Varela sought only credits against completed custodial time and did not challenge his underlying conviction, the court could no longer grant effective relief.
2. The respondent's motion to dismiss was granted, and the § 2241 petition was dismissed as moot.
3. The court certified that an appeal would not be taken in good faith and denied Varela leave to proceed in forma pauperis on appeal.

KEY QUOTATIONS

“Once the prisoner’s sentence has expired, however, he must make an affirmative showing that he is suffering some concrete “collateral consequence” because of his completed sentence, or his claim is properly dismissed as moot.”

“The § 2241 Petition is moot because Varela has completed his custodial sentence and has been released from BOP custody.”

FACTUAL BACKGROUND

Varela was serving a 180-month federal sentence imposed after convictions for conspiracy to distribute methamphetamine and possessing a firearm in furtherance of a drug-trafficking crime. He filed a § 2241 petition challenging the Bureau of Prisons' refusal to award First Step Act earned time credits for time served after his § 924(c) sentence. While the petition was pending, Varela completed his custodial sentence and was released from Bureau of Prisons custody on October 27, 2025. Because the petition sought only an award of credits against

custodial time and did not challenge the underlying conviction, the court concluded that no effective relief remained available.

PROCEDURAL HISTORY

Varela was convicted and sentenced in the District of Wyoming, and his direct appeal and § 2255 proceedings were unsuccessful. He later filed a motion concerning First Step Act credits, which the District of Wyoming construed as a § 2241 petition and denied for lack of confinement in that district. Varela filed this § 2241 petition in the Western District of Tennessee; while it was pending, he was released from federal custody. The court granted the respondent's motion to dismiss, dismissed the petition as moot, certified that an appeal would not be taken in good faith, and denied leave to proceed in forma pauperis on appeal.

DISPOSITION

dismissed

CASES CITED

- United States v. Varela, 576 Fed. Appx. 771 (10th Cir. 2014)
- United States v. Molina-Varela, United States v. Molina-Varela, 726 Fed. Appx. 722 (10th Cir. 2018)
- Loper Bright Enterprises v. Raimondo, 603 U.S. 369 (2024)
- Hollingsworth v. Perry, 570 U.S. 693, 704 (2013)
- Spencer v. Kemna, 523 U.S. 1, 7 (1998)
- Fialka-Feldman v. Oakland Univ. Bd. of Trustees, 639 F.3d 711, 713 (6th Cir. 2011)
- Demis v. Sniezek, 558 F.3d 508, 512 (6th Cir. 2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- Philadelphia Indem. Ins. Co. v. Youth Alive, Inc., 732 F.3d 645, 649 (6th Cir. 2013)
- Mediacom Se. LLC v. BellSouth Telecommunications, Inc., 672 F.3d 396, 399 (6th Cir. 2012)
- Rondigo, L.L.C. v. Twp. of Richmond, 641 F.3d 673, 680 (6th Cir. 2011)
- Bassett v. Nat'l Collegiate Athletic Ass'n, 528 F.3d 426, 430 (6th Cir. 2008)
- Witham v. United States, 355 F.3d 501, 504 (6th Cir. 2004)
- Kincade v. Sparkman, 117 F.3d 949, 952 (6th Cir. 1997)