

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MISSOURI, EASTERN DIVISION

Wayne L. Brondel v. Kathryn Thumann

Brondel · No. 4:25-cv-00715-JAR · Decided March 23, 2026

SUMMARY

The United States District Court for the Eastern District of Missouri denied as moot Wayne L. Brondel’s post-dismissal “Emergency Motion for Help” and “Motion for Information” in his habeas corpus action under 28 U.S.C. § 2241. The court held that the case was closed and that Brondel’s release from custody independently mooted his requests for injunctive relief. It further explained that claims concerning past confinement conditions must be brought in a separate action under 42 U.S.C. § 1983 rather than in a habeas petition.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Eastern Division
WRITING FOR THE COURT	John A. Ross
JURISDICTION	United States District Court for the Eastern District of Missouri, Eastern Division
DECIDED	March 23, 2026
DOCKET	4:25-cv-00715-JAR
DISPOSITION	other
PROCEDURAL POSTURE	After dismissing Brondel's 28 U.S.C. § 2241 habeas petition, the district court denied his subsequent Emergency Motion for Help and Motion for Information as moot.
STANDARD OF REVIEW	The court considered whether the post-dismissal motions were legally cognizable and whether the requested injunctive relief remained justiciable; it treated mootness as requiring denial of the motions.
PRECEDENTIAL VALUE	unknown
PARTIES	Wayne L. Brondel v. Kathryn Thumann

TOPICS

- federal habeas corpus
- injunctions
- section 1983
- prisoners rights
- civil procedure

PRACTICE AREAS

Federal habeas corpus

Prisoner civil rights

Mootness

Post-judgment procedure

QUESTIONS PRESENTED

1. Whether post-dismissal motions seeking injunctive relief could attach to a closed habeas action when they did not seek relief under Federal Rules of Civil Procedure 59(e) or 60(b).
2. Whether Brondel's requests for injunctive relief were moot after his release from the custody of the named respondent.
3. Whether claims concerning conditions of past confinement could be pursued in a habeas petition or instead had to be brought in a separate action under 42 U.S.C. § 1983.

HOLDINGS

1. Post-dismissal filings that do not seek to alter or amend the judgment under Federal Rule of Civil Procedure 59(e) or obtain relief under Rule 60(b) cannot attach to a closed action because no pending action remains.
2. A request for injunctive relief concerning conditions at a facility is moot when the petitioner is no longer confined there or in the custody of the named respondent.
3. Claims challenging conditions of past confinement are not cognizable in a habeas corpus petition and must, if pursued, be brought in a separate civil-rights action under 42 U.S.C. § 1983.

KEY QUOTATIONS

“Because the case is closed, there is no pending action to which these motions can attach.” (Discussion)

“Furthermore, to the extent Brondel seeks to challenge the conditions of his past confinement, such claims are not cognizable in a habeas corpus petition and must be brought, if at all, in a separate civil rights action under 42 U.S.C. § 1983.” (Discussion)

FACTUAL BACKGROUND

Brondel's habeas petition challenged his pretrial detention and ongoing Missouri criminal proceedings. In later motions, he alleged inadequate staffing, inadequate supervision, physical abuse, neglect, and retaliation at the St. Louis Forensic Treatment Center, and sought injunctive relief. Public records showed that the state court released Brondel on his own recognizance in September 2025, so he was no longer in the custody of respondent Kathryn Thumann.

PROCEDURAL HISTORY

Brondel filed a habeas petition in May 2025 challenging his pretrial detention and ongoing state criminal proceedings. The district court dismissed the petition on June 13, 2025, because the state proceedings were ongoing and state remedies had not been exhausted. Brondel then filed two motions seeking injunctive relief, which the court denied because the action was closed, the requested relief was substantively moot after his release, and conditions-of-confinement claims were not cognizable in habeas.

DISPOSITION

other

CASES CITED

- State v. Brondel, Nos. 20CW-CRO1864-01 and 22CW-CRO1104 (13th Jud. Cir. Sept. 11, 2025)
- Levy v. Ohl, 477 F.3d 988 (8th Cir. 2007)
- Stutzka v. McCarville, 420 F.3d 757, 760 n.2 (8th Cir. 2005)
- Smith v. Hundley, 190 F.3d 852, 855 (8th Cir. 1999)
- Spencer v. Haynes, 774 F.3d 467, 469-70 (8th Cir. 2014)

OPINION

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION WAYNE L. BRONDEL,) Petitioner, V. No. 4:25-cv-00715-JAR KATHRYN THUMANN, Respondent. MEMORANDUM AND ORDER On June 13, 2025, the Court dismissed Wayne L. Brondel’s petition for a writ of habeas corpus under 28 U.S.C. § 2241 because his state criminal proceedings were ongoing and he ☐☐☐☐☐ not exhausted his state remedies.

(ECF No. 3). Brondel has since filed an “Emergency Motion for Help” (ECF No. 8), and a “Motion for Information” (ECF No. 9). For the reasons set forth below, the Court denies both motions. I. Background Brondel filed his habeas petition in May 2025 challenging his pretrial detention and ongoing state criminal proceedings. (ECF No. 1). Following the Court’s dismissal of his petition (ECF Nos. 3, 4), Brondel filed an “Emergency Motion for Help” (ECF No. 8) and a “Motion for Information” (ECF No. 9).

In his “Emergency Motion,” Brondel alleges that a fellow detainee suffered “blistering burns” after another detainee threw hot coffee on her. (ECF No. 8 at 1). Brondel attributes the incident to inadequate staffing and a lack of supervision at the St. Louis Forensic Treatment Center. Id. In his “Motion for Information,” Brondel alleges systemic physical abuse and neglect by staff at the Treatment Center.

(ECF No. 9 at 1-3). He claims staff retaliated against him for filing lawsuits. Id. at 3. Brondel seeks injunctive relief in both motions. I. Discussion Brondel’s post-dismissal motions are moot for two reasons. First, the Court dismissed this action on June 13, 2025, which is prior to the Court’s receipt of these motions. Brondel’s subsequent filings do not seek to alter or amend the judgment under Federal Rule of Civil Procedure 59(e) or 60(b).

Because the case is closed, there is no pending action to which these motions can attach. Second, even if this case remained open, Brondel’s requests are substantively moot. The motions appear to be directed to three different judges and three different cases.

The Court takes judicial notice of the public records in Brondel's underlying state criminal matters, *State v. Brondel*, Nos. 20CW-CRO1 864-01 and 22CW-CRO1104 (13th Jud. Cir. Sept. 11, 2025). See *Levy v. Ohl*, 477 F.3d 988 (8th Cir. 2007); *Stutzka v. McCarville*, 420 F.3d 757, 760 n.2 (8th Cir. 2005). Those records reflect that in September 2025, the state court released Brondel on his own recognizance.

Because Brondel is no longer in the custody of the named respondent, Kathryn Thumann, the Court cannot grant the requested relief. See *Smith v. Hundley*, 190 F.3d 852, 855 (8th Cir. 1999) (holding that an inmate's release or transfer from a facility moots claims for injunctive relief _ regarding the conditions of that facility). Furthermore, to the extent Brondel seeks to challenge the conditions of his past confinement, such claims are not cognizable in a habeas corpus petition and must be brought, if at all, in a separate civil rights action under 42 U.S.C. § 1983.

See *Spencer v. Haynes*, 774 F.3d 467, 469-70 (8th Cir. 2014). Accordingly, IT IS HEREBY ORDERED that Brondel's "Emergency Motion for Help" (ECF No. 8) and "Motion for Information" (ECF No. 9) are DENIED as moot. Dated this 23" day of March, 2026. J ROSS ED STATES DISTRICT JUDGE