

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)

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