

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA, ERIE DIVISION

Leonard Brown v. Warden Newman

No. 1:25-CV-00134-RAL (W.D. Pa. Apr. 14, 2026) · No. 1:25-CV-00134-RAL · Decided April 15, 2026

SUMMARY

The court dismissed Leonard Brown’s 28 U.S.C. § 2241 habeas petition as moot. The Bureau of Prisons had expunged the disciplinary incident report and restored the 27 days of good conduct time challenged by Brown, leaving no effective relief or redressable collateral injury.

CASE DETAILS

COURT	United States District Court for the Western District of Pennsylvania, Erie Division
WRITING FOR THE COURT	Richard A. Lanzillo
JURISDICTION	United States District Court for the Western District of Pennsylvania, Erie Division
DECIDED	April 15, 2026
DOCKET	1:25-CV-00134-RAL
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging a disciplinary sanction and loss of good-conduct time.
PRECEDENTIAL VALUE	unpublished
PARTIES	Leonard Brown v. Warden Newman

TOPICS

- federal habeas corpus
- post-conviction relief
- subject matter jurisdiction
- constitutional law
- remedies

PRACTICE AREAS

- federal habeas corpus
- post-conviction relief
- constitutional law
- civil procedure
- remedies

QUESTIONS PRESENTED

- Whether the § 2241 petition became moot after the Bureau of Prisons expunged the challenged incident report and restored the petitioner's lost good-conduct time.

2. Whether the petitioner demonstrated a continuing collateral injury sufficient to preserve an Article III case or controversy.

HOLDINGS

1. The petition was moot because the Bureau of Prisons expunged the incident report and restored the 27 days of good-conduct time, leaving the court unable to provide any further habeas relief.
2. Collateral consequences are not presumed when a petitioner challenges the execution or term of a sentence rather than the lawfulness of the underlying conviction; the petitioner must prove a collateral injury that the court can redress.

KEY QUOTATIONS

“The case or controversy requirement continues through all stages of federal judicial proceedings, trial and appellate, and requires that parties have a personal stake in the outcome.”

“Thus, if developments occur that eliminate a petitioner’s personal stake in the outcome of a suit or prevent a court from being able to grant effective relief, the case must be dismissed as moot.”

“Since the BOP expunged the incident report and reversed the disciplinary sanction challenged in this action, as requested, there is no longer any habeas relief that this Court can provide.”

“Mootness, however it may have come about, simply deprives us of our power to act; there is nothing for us to remedy, even if we were disposed to do so.”

FACTUAL BACKGROUND

Leonard Brown, a federal inmate, challenged a prison disciplinary sanction that resulted in the loss of 27 days of good-conduct time. While the habeas action was pending, the Bureau of Prisons expunged the incident report and restored all 27 days. Because the requested relief had already been provided and no continuing collateral injury was shown, the court concluded that it could no longer grant effective relief.

PROCEDURAL HISTORY

Brown filed a § 2241 petition challenging a disciplinary sanction that caused the loss of 27 days of good-conduct time. After the petition was filed, the Bureau of Prisons expunged the incident report and restored the 27 days. The district court dismissed the petition with prejudice as moot and directed that the case be closed.

DISPOSITION

dismissed

CASES CITED

- Spencer v. Kemna, 523 U.S. 1, 7 (1998)
- Burkey v. Marberry, 556 F.3d 142, 147-51 (3d Cir. 2009)
- Lewis v. Continental Bank Corp., 494 U.S. 472, 477-78 (1990)

- Keitel v. Mazurkiewicz, 729 F.3d 278, 280 (3d Cir. 2013)
- Killian v. FCI-Allenwood, 2018 WL 2292757, at *1 (M.D. Pa. May 18, 2018)
- Scott v. Schuylkill FCI, 298 Fed. Appx. 202, 204 (3d Cir. 2008)

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