

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
ALABAMA, NORTHERN DIVISION

Alan Woolsey v. Warden Washington

Woolsey · No. 2:25-CV-137-WKW · Decided January 7, 2026

SUMMARY

The United States District Court for the Middle District of Alabama dismissed Alan Woolsey’s 28 U.S.C. § 2241 habeas petition without prejudice as moot after his transfer from federal prison to supervised release. The court also denied as moot his motion for an extension of time to file a reply and cancelled the scheduled evidentiary hearing.

CASE DETAILS

COURT	United States District Court for the Middle District of Alabama, Northern Division
WRITING FOR THE COURT	W. Keith Watkins
JURISDICTION	United States District Court for the Middle District of Alabama, Northern Division
DECIDED	January 7, 2026
DOCKET	2:25-CV-137-WKW
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner sought habeas relief under 28 U.S.C. § 2241 concerning the calculation and application of First Step Act time credits and possible Second Chance Act rewards. After Petitioner was transferred from custody to supervised release, the court considered the petition moot and dismissed it without prejudice.
STANDARD OF REVIEW	The court determined whether a live case or controversy remained and whether it could provide meaningful relief after Petitioner's transfer to supervised release.
PRECEDENTIAL VALUE	Unpublished district court order; nonprecedential
PARTIES	Alan Woolsey v. Warden Washington

TOPICS

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

PRACTICE AREAS

Federal habeas corpus

Post-conviction relief

Mootness

QUESTIONS PRESENTED

1. Whether Woolsey's § 2241 petition seeking application of First Step Act and Second Chance Act credits became moot after his transfer to prerelease custody and supervised release.
2. Whether Woolsey's pending motion for an extension of time to file a reply brief and the scheduled evidentiary hearing should be denied or cancelled as moot.

HOLDINGS

1. A § 2241 petition seeking transfer-related custody relief is moot when the petitioner has been transferred to prerelease custody and supervised release, leaving the court unable to provide meaningful relief.

KEY QUOTATIONS

"Because Petitioner has been transferred to supervised release, there is no longer a case or controversy to litigate, and this court is unable to provide any meaningful relief to Petitioner."

"The Petition for Writ of Habeas Corpus under 28 U.S.C. § 2241 (Doc. # 1) is DISMISSED without prejudice as moot."

FACTUAL BACKGROUND

Woolsey sought application of First Step Act time credits dating from his October 7, 2017 sentencing, including credits based on his recidivism-risk assessments, as well as any available Second Chance Act rewards. During the litigation, he was transferred from the Federal Prison Camp in Montgomery, Alabama to prerelease custody and then to supervised release in his hometown. Because the requested transfer-related relief had occurred, the court found that no meaningful relief remained available.

PROCEDURAL HISTORY

Woolsey filed a pro se § 2241 petition on February 18, 2025 while incarcerated at the Federal Prison Camp in Montgomery, Alabama. Counsel was later appointed, and Respondent filed a supplemental response asserting mootness after Woolsey's transfer to prerelease custody. Woolsey then represented that he had been released to supervised release. The court denied as moot his motion for an extension of time, cancelled the evidentiary hearing, and dismissed the petition without prejudice as moot.

DISPOSITION

dismissed

CASES CITED

- Adams v. Washington, 2025 WL 2174855, at *1–2 (M.D. Ala. July 31, 2025)
- Singleton v. Neely, 2023 WL 9550049, at *3–4 (N.D. Ala. Dec. 21, 2023)

- Singleton v. Neely, 2023 WL 9550049, at *3–4 (N.D. Ala. Dec. 21, 2023), R&R adopted, 2024 WL 3640177 (N.D. Ala. Feb. 7, 2024)

OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION ALAN WOOLSEY,)) Petitioner,)) v.) CASE NO. 2:25-CV-137-
WKW) [WO] WARDEN WASHINGTON,)) Respondent.) ORDER Petitioner Alan Woolsey
filed a Petition for Writ of Habeas Corpus under 28 U.S.C. § 2241, which was docketed on
February 18, 2025. (Doc. # 1.)

In his petition, Petitioner asked the court to (a) apply First Step Act time credits (FTC[]s) beginning 10/07/2017, the date of Petitioner’s sentencing, (b) apply 15[] days of FTC[]s per month beginning on 5/14/2020, the date of his 2nd consecutive assessment as a low [recidivism-risk level], (c) calculate and apply FTC[]s at the rate stipulated in the [FSA]... thus transferring [Petitioner] to prelease custody immediately[,] [and] (d) if eligible, apply any Second Chance Act (SCA) rewards towards Petitioner’s prerelease date.

(Doc. # 1 at 6.) At the time of filing, Petitioner was proceeding pro se and incarcerated at the Federal Prison Camp in Montgomery, Alabama (“FPC Montgomery”). By Order dated October 2, 2025, Joseph Mitchell McGuire was appointed as counsel for Petitioner. (Doc. # 22.)

On December 15, 2025, Respondent filed a supplemental response and notice of mootness. (Doc. # 27.) Respondent’s response noted (and the court agrees) that Petitioner’s transfer to prerelease custody moots his § 2241 petition. (See Doc. # 27 at 11–15.)

Before the court is Petitioner’s unopposed motion for an extension of time to file a reply brief. (Doc. # 28.) The motion states that “Plaintiff was recently released from [FPC Montgomery] to supervised release in his hometown.” (Doc. # 28 at 1, ¶ 4.)

Because Petitioner has been transferred to supervised release, there is no longer a case or controversy to litigate, and this court is unable to provide any meaningful relief to Petitioner. See *Adams v. Washington*, 2025 WL 2174855, at *1–2 (M.D. Ala. July 31, 2025) (dismissing a § 2241 petition as moot where the petitioner had been transferred to prerelease custody at a residential reentry center); see also *Singleton v. Neely*, 2023 WL 9550049, at *3–4 (N.D.

Ala. Dec. 21, 2023) (recommending dismissal of § 2241 petition as moot because the petitioner received her requested relief upon her transfer to prerelease custody), R&R adopted, 2024 WL 3640177 (N.D. Ala. Feb. 7, 2024). Based on the foregoing, it is ORDERED as follows: (1) Petitioner’s motion for an extension to file a reply brief (Doc. # 27) is DENIED as moot; (2) The evidentiary hearing on the merits scheduled for January 22, 2026 at 9:00 a.m. is CANCELLED; and (3) The Petition for Writ of Habeas Corpus under 28 U.S.C. § 2241 (Doc. # 1) is DISMISSED without prejudice as moot.

Final Judgment will be entered separately. DONE this 7th day of January, 2026. /s/ W. Keith Watkins UNITED STATES DISTRICT JUDGE

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