

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Sumit Garg v. Warden J. Greene

Garg · No. 3:25cv2005 · Decided January 30, 2026

SUMMARY

The United States District Court for the Middle District of Pennsylvania denied Sumit Garg’s 28 U.S.C. § 2241 habeas petition challenging a prison disciplinary conviction and related sanctions. The court held that Garg received the procedural protections required by due process and that the disciplinary finding was supported by some evidence. The court dismissed as moot Garg’s claim concerning First Step Act time credits because the Bureau of Prisons recalculated and applied the credits he sought.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Julia K. Munley
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	January 30, 2026
DOCKET	3:25cv2005
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging a prison disciplinary conviction, sanctions, and the Bureau of Prisons' calculation and application of First Step Act time credits.
STANDARD OF REVIEW	For a prison disciplinary decision implicating good-conduct time, due process is satisfied if the prisoner received the procedures required by Wolff v. McDonnell and the decision was supported by some evidence in the record. The court does not independently assess credibility or reweigh the evidence. Mootness is reviewed under Article III's case-or-controversy requirement.
PRECEDENTIAL VALUE	unpublished
PARTIES	Sumit Garg v. Warden J. Greene

TOPICS

federal habeas corpus

prisoners rights

procedural due process

equal protection

sentence modification

PRACTICE AREAS

Federal habeas corpus

Prison disciplinary proceedings

Prisoner civil rights

First Step Act time credits

QUESTIONS PRESENTED

1. Whether Garg's prison disciplinary conviction and sanctions violated due process because the DHO's finding was not supported by some evidence.
2. Whether the DHO violated due process by finding Garg guilty of Code 297 rather than the Code 397 offense Garg claimed was appropriate.
3. Whether the disciplinary sanctions were authorized and constitutionally excessive.
4. Whether Garg established an equal protection violation by alleging that his cellmate received a lesser sanction.
5. Whether Garg's challenge to the BOP's calculation and application of FSA time credits was moot after the BOP recalculated and applied the credits.

HOLDINGS

1. The disciplinary conviction satisfied due process because Garg received the procedures required for a hearing affecting good-conduct time and the DHO's finding was supported by some evidence.
2. The DHO did not violate due process by finding Garg guilty of Code 297 because the governing regulation permits the DHO to find that an inmate committed the charged prohibited act or a similar prohibited act described in the incident report, and the evidence supported the Code 297 classification.
3. The loss of 27 days of good-conduct time and six months of telephone privileges was authorized by the governing regulations and was not constitutionally excessive.
4. Garg failed to establish an equal protection violation because he did not allege or prove purposeful discrimination based on membership in a protected class, and the record did not show that his cellmate received a lesser sanction.
5. Garg's challenge to the calculation and application of FSA time credits was moot because the BOP recalculated his credits, applied 155 days to his sentence, and provided the relief he requested.

KEY QUOTATIONS

“Rather, the relevant question is whether there is “any evidence in the record that could support the conclusion reached” by the factfinder.” (11)

“As Garg has received the requested relief—recalculation of his FSA time credits—he no longer has a concrete, redressable injury.” (17-18)

FACTUAL BACKGROUND

Garg was serving a 108-month federal sentence for cyberstalking-related offenses. Prison staff determined that Garg allowed his cellmate to use Garg's telephone account on multiple occasions, including a monitored call on March 13, 2025, and charged him with Prohibited Act Code 297. After a disciplinary hearing, the DHO found him guilty based on staff observations, video still photographs, a staff memorandum, telephone-system records, and Garg's admission, imposing the loss of 27 days of good-conduct time and six months of telephone privileges. While the habeas case was pending, the BOP recalculated and applied 155 days of FSA time credits to his sentence.

PROCEDURAL HISTORY

Garg filed a § 2241 petition alleging that his prison disciplinary conviction violated due process and that the Bureau of Prisons failed to timely award his First Step Act time credits. During the litigation, the Bureau recalculated and applied 155 days of credits to his sentence, changing his projected release date. The court denied the disciplinary-hearing challenge and dismissed the FSA-credit challenge as moot.

DISPOSITION

dismissed

CASES CITED

- Sandin v. Conner, 515 U.S. 472, 484-87 (1995)
- Wilkinson v. Austin, 545 U.S. 209, 221 (2005)
- Superintendent, Mass. Corr. Inst., Walpole v. Hill, 472 U.S. 445, 454-56 (1985)
- Wolff v. McDonnell, 418 U.S. 539, 555-71 (1974)
- Vajtauer v. Comm'r of Immigration, 273 U.S. 103, 106 (1927)
- Levi v. Holt, 192 F. App'x 158, 162 (3d Cir. 2006)
- Rummel v. Estelle, 445 U.S. 263, 271-74 (1980)
- Moles v. Holt, 221 F. App'x 92, 95 (3d Cir. 2007)
- Washington v. Davis, 426 U.S. 229, 239 (1976)
- Mack v. Warden Loretto FCI, 839 F.3d 286, 305 (3d Cir. 2016)
- Myrie v. Comm'r, N.J. Dep't of Corr., 267 F.3d 251, 263 (3d Cir. 2001)
- Millard v. Hufford, 415 F. App'x 348 (3d Cir. 2011)
- Burkey v. Marberry, 556 F.3d 142, 147 (3d Cir. 2009)
- Lewis v. Continental Bank Corp., 494 U.S. 472, 477-78 (1990)
- Spencer v. Kemna, 523 U.S. 1, 7 (1998)
- Blanciak v. Allegheny Ludlum Corp., 77 F.3d 690, 698-99 (3d Cir. 1996)