

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

Donyell M. Coleman v. United States of America

Coleman · No. 4:25-cv-01587-SEP · Decided May 1, 2026

SUMMARY

The United States District Court for the Eastern District of Missouri considers Donyell M. Coleman's petition for habeas corpus under 28 U.S.C. § 2241. Coleman seeks early termination of supervised release based on Federal Time Credits earned under the First Step Act. The court requests briefing on whether those credits may reduce the length of supervised release, an issue on which the federal circuits have divided.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Eastern Division
WRITING FOR THE COURT	Sara E. Pitlyk
JURISDICTION	United States District Court for the Eastern District of Missouri, Eastern Division
DECIDED	May 1, 2026
DOCKET	4:25-cv-01587-SEP
DISPOSITION	other
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2241; the court ordered the government to respond and the petitioner to file a reply without resolving the merits.
STANDARD OF REVIEW	The court conducted an initial review under Rule 4 of the Rules Governing Habeas Corpus Cases under Section 2254; it did not reach the merits of the statutory claim.
PRECEDENTIAL VALUE	Nonprecedential district-court memorandum and order; no merits holding.
PARTIES	Donyell M. Coleman v. United States of America

TOPICS

- federal habeas corpus
- sentence modification
- statutory interpretation
- post-conviction relief

PRACTICE AREAS

Federal habeas corpus

federal sentencing

statutory interpretation

QUESTIONS PRESENTED

1. Whether Coleman remains in custody for purposes of § 2241 while serving supervised release.
2. Whether Federal Time Credits under 18 U.S.C. § 3632(d)(4)(C) may be applied to reduce the length of a supervised-release term.
3. Whether the government should be required to brief the unresolved statutory issue because the Eighth Circuit had not decided it.

KEY QUOTATIONS

“Because the Eighth Circuit Court of Appeals has not yet spoken on this issue, the Court will ask for briefing on this matter.” (at 2)

FACTUAL BACKGROUND

Coleman pleaded guilty in federal court to conspiracy to distribute heroin and received a 140-month prison sentence followed by four years of supervised release. He was released from prison on October 3, 2022, and alleged that he earned approximately 300 Federal Time Credits through First Step Act programming. He claimed that the Bureau of Prisons did not recalculate his prison or supervised-release sentences and sought early termination of supervised release.

PROCEDURAL HISTORY

Coleman filed a § 2241 petition and an amended petition seeking application of Federal Time Credits to reduce his term of supervised release. The district court reviewed the filings under Rule 4 of the Rules Governing Habeas Corpus Cases under Section 2254 and ordered respondent to answer by June 1, 2026, with Coleman permitted to reply by July 1, 2026.

DISPOSITION

other

CASES CITED

- Hargrove v. Healy, 155 F.4th 530 (6th Cir. 2025)
- Guerriero v. Miami RRM, 2024 WL 2017730 (11th Cir. May 7, 2024) (per curiam)
- United States v. Malik, 2025 WL 973003 (4th Cir. Apr. 1, 2025) (per curiam)
- Stinson v. Martinez, 2025 WL 2017872 (5th Cir. July 18, 2025) (per curiam)
- Valladares v. Ray, 130 F.4th 74 (4th Cir. 2025)
- Gonzalez v. Herrera, 151 F.4th 1076, 1089 (9th Cir. 2025)

- Wilson v. Fikes, 2019 WL 7593244, at *2 (D. Minn. Aug. 27, 2019), report and recommendation adopted, 2019 WL 6318621, at *1 (D. Minn. Nov. 26, 2019)
- United States v. Coleman, No. 4:13-CR-00487-SEP (E.D. Mo.)

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