

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

Jamell Jackson v. Mrs. DePlatchett

Jackson v. DePlatchett · No. 1:25-CV-00128-RAL · Decided January 26, 2026

SUMMARY

The United States District Court for the Western District of Pennsylvania denied Jamell Jackson’s motion for preliminary injunctive relief as moot. The court held that Jackson’s release from Pennsylvania Department of Corrections custody prevented the defendant from effectuating equitable relief, and that the Pennsylvania Board of Parole could not be enjoined because it was not a party to the action.

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	January 26, 2026
DOCKET	1:25-CV-00128-RAL
DISPOSITION	denied
PROCEDURAL POSTURE	Plaintiff moved for preliminary injunctive relief in a pro se civil-rights action. The court denied the motion as moot because Plaintiff had been released from incarceration and the Defendant no longer controlled his conditions of confinement; the requested relief directed to the Pennsylvania Parole Board also failed because the Board was not a party.
STANDARD OF REVIEW	Preliminary injunctive relief is an extraordinary remedy available only in limited circumstances. The movant must clearly show a reasonable likelihood of success on the merits, a likelihood of irreparable harm absent relief, that the balance of equities favors relief, and that relief is in the public interest.
PRECEDENTIAL VALUE	unpublished

TOPICS

injunctions

prisoners rights

civil rights

equitable relief

civil procedure

PRACTICE AREAS

civil rights

prisoner civil rights

injunctive relief

federal civil procedure

QUESTIONS PRESENTED

1. Whether Jackson's request for injunctive relief against a prison official was rendered moot by his release from incarceration.
2. Whether the court could grant injunctive relief directed to the Pennsylvania Parole Board when the Board was not a party to the action.
3. Whether Jackson demonstrated entitlement to preliminary injunctive relief.

HOLDINGS

1. Jackson's request for injunctive relief against DePlatchett was moot because Jackson was no longer incarcerated and DePlatchett no longer exercised control over him or his conditions of confinement.
2. The motion could not result in injunctive relief against the Pennsylvania Parole Board because the Board was not a party to the lawsuit.
3. Jackson failed to demonstrate any entitlement to preliminary injunctive relief.

KEY QUOTATIONS

“Preliminary injunctive relief is “an extraordinary remedy” that “should be granted only in limited circumstances.””

“Generally, an inmate’s transfer to another prison or release moots his request for declaratory or injunctive relief.”

“The general rule is that a court may not enter an injunction against a person who has not been made a party to the case before it.”

FACTUAL BACKGROUND

Jackson, formerly incarcerated at SCI Albion, alleged that between February and March 2024 DePlatchett exposed her naked body in a prison bathroom and made inappropriate comments about his physical appearance. He characterized the conduct as sexual harassment and sought damages and equitable relief. After moving for a preliminary injunction, Jackson was released from SCI Albion and Pennsylvania Department of Corrections custody.

PROCEDURAL HISTORY

Jamell Jackson filed a civil-rights action against Mrs. DePlatchett, a unit manager at SCI Albion, alleging sexual harassment and seeking damages and equitable relief. He moved for a preliminary injunction. After filing the

motion, Jackson notified the court that he had been released from SCI Albion and Pennsylvania Department of Corrections custody. The court denied the motion for preliminary injunctive relief.

DISPOSITION

denied

CASES CITED

- 369 F.3d 700, 708 (3d Cir. 2004)
- 42 F.3d 1421, 1427 (3d Cir. 1994)
- 74 F.4th 120, 126 (3d Cir. 2023)
- 555 U.S. 7, 20 (2008)
- 895 F.3d 272, 285 (3d Cir. 2018)
- 520 U.S. 968, 972 (1997)
- 4 F.3d 195, 206 (3d Cir. 1993)
- 19 F. Supp. 2d 323, 326 (M.D. Pa. 1998)
- 70 F. Supp. 2d 1252, 1259 (D. Kan. 1999)
- 2025 WL 3295527, at *2 (D.N.J. Nov. 26, 2025)
- 2014 WL 5464848, at *3 (W.D. Pa. Oct. 27, 2014)

OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA ERIE DIVISION JAMELL JACKSON,)) Plaintiff) 1:25-CV-00128-RAL) vs.) RICHARD A. LANZILLO) Chief United States Magistrate Judge MRS. DEPLATCHETT,)) MEMORANDUM ORDER ON Defendant) PLAINTIFF’S MOTION FOR) PRELIMINARY INJUNCTIVE RELIEF) IN RE: ECF NO. 11) Plaintiff Jamell Jackson is an individual previously in the custody of the Pennsylvania Department of Corrections (“DOC”) at its State Correctional Institution at Albion (“SCI Albion”).

He commenced this pro se civil rights action against Defendant DePlatchett, a unit manager at SCI Albion. Pending before the Court is the Plaintiff’s Motion for Preliminary Injunction.¹ ECF No. 11. Because Plaintiff is no longer incarcerated and DePlatchett cannot effectuate any equitable relief the Court may order, his motion will be denied as moot.

I. Background Plaintiff’s Complaint alleges that sometime between February and March, 2024, Plaintiff was using the prison bathroom facilities when DePlatchett exposed his naked body and make inappropriate comments about his physical appearance. ¹ The parties have consented to the jurisdiction of a United States Magistrate Judge in these proceedings pursuant to 28 U.S.C. § 636.

ECF No. 9, p. 11. He claims that DePlatchett's conduct constituted sexual harassment, and he seeks compensatory and punitive damages and equitable relief against her.. Plaintiff's Motion for Preliminary Injunction requests (1) a declaration that DePlatchett violated his constitutional rights; (2) an order directing DePlatchett to stop retaliatory measures against him; (3) an order directing the Pennsylvania Board of Parole to grant him a rehearing; and (4) an order directing DePlatchett to pay his Court costs.

ECF No. 11, pp. 7-9. Two months after Plaintiff filed his motion, he filed a notification of change of address indicating that he has been released from SCI Albion and the custody of the Pennsylvania Department of Corrections. ECF No. 12. II. Standard of Review Preliminary injunctive relief is "an extraordinary remedy" that "should be granted only in limited circumstances.", 369 F.3d 700, 708 (3d Cir.

2004) (quoting., 42 F.3d 1421, 1427 (3d Cir. 1994)). In evaluating a motion for a temporary restraining order or preliminary injunctive relief, a court considers: (1) whether the movant is reasonably likely to success on the merits; (2) whether the movant is more likely than not to suffer irreparable harm absent preliminary relief; (3) whether the balance of equities favors granting relief; and (4) whether injunctive relief is in the public interest., 74 F.4th 120, 126 (3d Cir.

2023) (citing, 555 U.S. 7, 20 (2008)). A court should not grant relief "unless the movant, by a clear showing, carries the burden of persuasion.", 895 F.3d 272, 285 (3d Cir. 2018) (quoting, 520 U.S. 968, 972 (1997)). III. Analysis and Discussion Plaintiff's motion is moot to the extent he seeks injunctive relief against DePlanchett, a prison official who no longer exercises control over him or his conditions of confinement., 4 F.3d 195, 206 (3d Cir.

1993);, 19 F. Supp. 2d 323, 326 (M.D. Pa. 1998);, 70 F. Supp. 2d 1252, 1259 (D. Kan. 1999) ("Generally, an inmate's transfer to another prison or release moots his request for declaratory or injunctive relief.") (collecting cases).

To the extent Plaintiff seeks injunctive relief against the Pennsylvania Parole Board, his motion also fails because because the Board is not a party to his lawsuit., 2025 WL 3295527, at *2 (D.N.J. Nov. 26, 2025)., 2014 WL 5464848, at *3 (W.D. Pa. Oct. 27, 2014) ("The general rule is that a court may not enter an injunction against a person who has not been made a party to the case before it.") (citation modified).

IV. Conclusion and Order Because Plaintiff has failed to demonstrate any entitlement to preliminary injunctive relief, it is hereby ORDERED that Plaintiff's motion for Preliminary Injunction (ECF No. 11). is DENIED. DATED this 26th day of January, 2026. BY THE COURT: RICHARD A. LANZILLO CHIEF UNITED STATES MAGISTRATE JUDGE

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