

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF KANSAS

Marshall Dewayne Williams v. United States of America, et al.

Williams · No. 26-3036-JWL · Decided March 17, 2026

SUMMARY

The United States District Court for the District of Kansas denies Marshall DeWayne Williams’s motion for an emergency preliminary injunction. The court concludes that Plaintiff failed to make the heightened showing required to establish a likelihood of success on the merits and entitlement to preliminary relief concerning the alleged threatened disposal of his legal materials.

CASE DETAILS

COURT	United States District Court for the District of Kansas
WRITING FOR THE COURT	John W. Lungstrum
JURISDICTION	United States District Court for the District of Kansas
DECIDED	March 17, 2026
DOCKET	26-3036-JWL
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff, proceeding pro se in a mandamus action and in forma pauperis, moved for an emergency preliminary injunction to prevent alleged disposal of his legal materials and to require access to the Bureau of Prisons administrative-remedy process.
STANDARD OF REVIEW	A preliminary injunction requires a showing of likelihood of success on the merits, likely irreparable harm absent relief, a favorable balance of equities, and consistency with the public interest. The movant's right to relief must be clear and unequivocal, and alleged irreparable injury must be certain, actual, and imminent rather than theoretical or speculative.
PRECEDENTIAL VALUE	unpublished district court memorandum and order; limited precedential value
PARTIES	Marshall Dewayne Williams v. United States of America, et al.

TOPICS

- injunctions
- prisoners rights
- equitable relief
- civil rights
- civil procedure

PRACTICE AREAS

civil procedure

prisoners rights

civil rights

equitable relief

QUESTIONS PRESENTED

1. Whether Williams demonstrated entitlement to a preliminary injunction preventing the defendants from disposing of his legal materials.
2. Whether Williams demonstrated entitlement to injunctive relief requiring the defendants to permit him to pursue the Bureau of Prisons administrative-remedy process.

HOLDINGS

1. Williams was not entitled to a preliminary injunction because he failed to demonstrate a likelihood of success on the merits and did not make the heightened showing required for this extraordinary remedy.
2. The allegations did not establish irreparable harm because they did not show an injury that was certain, great, actual, and not merely theoretical or feared to occur at an indefinite future time.
3. In evaluating preliminary injunctive relief affecting prison conditions, the court must give substantial weight to adverse impacts on public safety and prison operations, and such relief should issue only under exceptional and compelling circumstances.

KEY QUOTATIONS

“To constitute irreparable harm, an injury must be certain, great, actual and not theoretical.”

“A preliminary injunction is “an extraordinary remedy that may only be awarded upon a clear showing that the plaintiff is entitled to such relief.””

“Because preliminary injunctions are drastic remedies—“the exception rather than the rule—plaintiffs must show that they are clearly and unequivocally entitled to relief.””

FACTUAL BACKGROUND

Williams, incarcerated at Leavenworth Federal Correctional Institution, alleged that Bureau of Prisons personnel confiscated four boxes of his legal materials while he was housed at FCI-McKean. He alleged that a defendant refused to provide confiscation and disposal forms and threatened to discard the materials on April 11, 2026. He sought an injunction protecting the materials and requiring access to the Bureau of Prisons administrative-remedy process. The court also noted that Williams had unsuccessfully sought similar injunctive relief in another federal action concerning confiscated materials.

PROCEDURAL HISTORY

Williams filed the complaint and motion for preliminary injunction in the District of Kansas. The court considered the motion and denied it because Williams failed to demonstrate a likelihood of success on the merits or make the heightened showing required for preliminary injunctive relief.

DISPOSITION

other

CASES CITED

- Williams v. Bondi, et al., Case No. 1:25-cv-00126-SPB-RAL (W.D. Penn.)
- Little v. Jones, 607 F.3d 1245, 1251 (10th Cir. 2010)
- Dominion Video Satellite, Inc. v. Echostar Satellite Corp., 356 F.3d 1256, 1260 (10th Cir. 2004)
- Heideman v. S. Salt Lake City, 348 F.3d 1182, 1189 (10th Cir. 2003)
- State of Connecticut v. Commonwealth of Massachusetts, 282 U.S. 660, 674 (1931)
- Winter v. Natural Res. Def. Council, Inc., 555 U.S. 7, 22 (2008)
- Schrier v. Univ. of Colo., 427 F.3d 1253, 1258 (10th Cir. 2005)
- Escobar v. Reid, 2008 WL 4877009, at *3 (D. Colo. Nov. 12, 2008)
- Adrian v. Westar Energy, Inc., No. 11-1265-KHV, 2011 WL 6026148, at *3 (D. Kan. 2011)

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