

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA

Oscar Hall v. Warden

Hall v. Warden · No. 3:25-CV-699 DRL-SJF · Decided December 8, 2025

SUMMARY

The court dismissed Oscar Hall’s habeas petition without prejudice because he had not exhausted available Indiana state-court remedies concerning the calculation of his sentence and educational credit time. The court rejected Hall’s arguments that exhaustion was unnecessary under 28 U.S.C. § 2241, satisfied by administrative remedies, futile, or unduly burdensome. The court also denied a certificate of appealability and directed the clerk to close the case.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana
WRITING FOR THE COURT	Damon R. Leichty
JURISDICTION	United States District Court for the Northern District of Indiana
DECIDED	December 8, 2025
DOCKET	3:25-CV-699 DRL-SJF
DISPOSITION	dismissed
PROCEDURAL POSTURE	A state prisoner filed a federal habeas petition challenging the Indiana Department of Correction's calculation of his sentence and alleged that the terms of his case plan credit time agreement violated procedural due process. After the court identified failure to exhaust state court remedies, it allowed Hall to respond and then dismissed the petition without prejudice.
STANDARD OF REVIEW	The petition was screened under Rule 4 of the Rules Governing Section 2254 Cases. The court applied the statutory exhaustion requirements of 28 U.S.C. § 2254(b) and reviewed whether an exception applied. For the certificate of appealability, the court applied the Slack v. McDaniel standard for procedural dismissals.
PRECEDENTIAL VALUE	unknown; unpublished district court opinion
PARTIES	Oscar Hall v. Warden

TOPICS

federal habeas corpus

post-conviction relief

state post-conviction relief

procedural due process

civil procedure

PRACTICE AREAS

Federal habeas corpus

Prisoner litigation

Post-conviction relief

Constitutional law

QUESTIONS PRESENTED

1. Whether an Indiana state prisoner challenging the calculation of his sentence must exhaust state court remedies before seeking federal habeas relief under either 28 U.S.C. § 2241 or § 2254.
2. Whether administrative exhaustion under the Prison Litigation Reform Act satisfies the state-court exhaustion requirement for a federal habeas petition.
3. Whether Hall should be excused from exhausting state court remedies because state corrective processes were unavailable, ineffective, or futile.
4. Whether Hall was entitled to a certificate of appealability after dismissal on procedural exhaustion grounds.

HOLDINGS

1. A state prisoner challenging the calculation of his sentence must exhaust available state court remedies before pursuing federal habeas relief; the exhaustion requirement applies even though Hall characterized his petition as arising under § 2241.
2. Exhaustion of administrative remedies under the PLRA does not satisfy the separate requirement to exhaust state court remedies under § 2254.
3. Hall was not excused from exhausting state court remedies because Indiana provides available procedures capable of addressing sentence-calculation and credit-time claims, and Hall did not show that the state process was ineffective to protect his rights.
4. Hall was not entitled to a certificate of appealability because reasonable jurists would not debate the correctness of the procedural exhaustion ruling.

KEY QUOTATIONS

“the requirements of § 2254 must be met by all state prisoners filing petitions for writs of habeas corpus after conviction.”

“cases properly brought under §§ 2241 or 2254 as habeas corpus petitions are not subject to the PLRA.”

“Courts must apply a statute as written when the language is plain and unambiguous.”

FACTUAL BACKGROUND

Oscar Hall is an Indiana prisoner challenging the Indiana Department of Correction's calculation of his sentence and educational credit time. He alleged that he signed a case plan credit time agreement without being informed that it would affect his ability to accrue credit time through other means. He alternatively characterized the

dispute as one involving enforcement of the agreement and asserted that the agreement violated procedural due process or contractual rights.

PROCEDURAL HISTORY

Hall initially characterized his claim as challenging an unconscionably ambiguous agreement affecting his ability to accrue credit time, but later framed it as a contract-enforcement claim. The court treated both formulations as challenges to sentence calculation, concluded that state court remedies had not been exhausted, rejected Hall's arguments for exemption from exhaustion, dismissed the petition without prejudice, denied a certificate of appealability, and directed the clerk to close the case.

DISPOSITION

dismissed

CASES CITED

- Brown v. Rios, 696 F.3d 638 (7th Cir. 2012)
- Walters v. Edgar, 163 F.3d 430 (7th Cir. 1998)
- Graham v. Broglin, 922 F.2d 379 (7th Cir. 1991)
- Walker v. O'Brien, 216 F.3d 626, 633-34 (7th Cir. 2000)
- United States v. Castor, 937 F.2d 293, 296 (7th Cir. 1991)
- Hardley v. State, 893 N.E.2d 740, 742-43 (Ind. Ct. App. 2008)
- Willet v. State, 151 N.E.3d 1274, 1278 (Ind. Ct. App. 2020)
- Miller v. Walker, 642 N.E.2d 1000 (Ind. Ct. App. 1994)
- Miller v. Walker, 655 N.E.2d 47 (Ind. 1995)
- Bradford v. State, 211 N.E.3d 36, 38-39 (Ind. Ct. App. 2023)
- Ladra v. State, 177 N.E.3d 412, 421 (Ind. 2021)
- Zimmerman v. Tribble, 226 F.3d 568, 571 (7th Cir. 2000)
- Brown v. Indiana Department of Correction, 2023 WL 2241128, at *3 (N.D. Ind. Feb. 23, 2023)
- Gardner v. State, 173 N.E.3d 1049 (Ind. Ct. App. 2021)
- Manning v. United States, 546 F.3d 430, 433 (7th Cir. 2008)
- Slack v. McDaniel, 529 U.S. 473, 484 (2000)