

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA, SOUTH BEND DIVISION

Tyler J. Arbuckle v. Warden

Arbuckle · No. 3:26-CV-137-PPS-JEM · Decided April 22, 2026

SUMMARY

The court dismissed Tyler J. Arbuckle’s case and preliminary injunction motion as moot after he was transferred from Indiana State Prison to Miami Correctional Facility. Because the action sought injunctive relief and there was no indication that Arbuckle was likely to be transferred back, the court dismissed for lack of jurisdiction.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana, South Bend Division
WRITING FOR THE COURT	Philip P. Simon
JURISDICTION	United States District Court for the Northern District of Indiana, South Bend Division
DECIDED	April 22, 2026
DOCKET	3:26-CV-137-PPS-JEM
DISPOSITION	dismissed
PROCEDURAL POSTURE	A pro se prisoner sought a preliminary injunction and permanent injunctive relief against the Indiana State Prison Warden in his official capacity. After the prisoner was transferred to another facility, the district court dismissed the action as moot for lack of jurisdiction.
STANDARD OF REVIEW	The court applied the jurisdictional mootness requirement for claims seeking injunctive relief.
PRECEDENTIAL VALUE	Unpublished district court opinion

TOPICS

- injunctions
- subject matter jurisdiction
- prisoners rights
- civil procedure
- equitable relief

PRACTICE AREAS

- prisoner civil rights
- constitutional law
- federal jurisdiction

QUESTIONS PRESENTED

1. Whether Arbuckle's request for preliminary and permanent injunctive relief became moot after he was transferred from Indiana State Prison to another correctional facility without demonstrating a likelihood of retransfer.
2. Whether a moot claim must be dismissed for lack of subject-matter jurisdiction.

HOLDINGS

1. A prisoner's request for injunctive relief against officials at the original prison is moot after the prisoner is transferred to another prison unless the prisoner demonstrates that he is likely to be retransferred.
2. A claim that is moot must be dismissed for lack of jurisdiction.

KEY QUOTATIONS

“When ‘a prisoner is transferred to another prison, his request for injunctive relief against officials of the first prison is moot unless he can demonstrate that he is likely to be retransferred.’” (83 F.3d at 811)

“‘Allegations of a likely retransfer may not be based on mere speculation.’” (83 F.3d at 811)

“In an action seeking only injunctive relief, this requirement ordinarily means that, once the threat of the act sought to be enjoined dissipates, the suit must be dismissed as moot.” (442 F.3d at 596)

FACTUAL BACKGROUND

Arbuckle, an incarcerated person proceeding without counsel, sought injunctive relief to protect him from attack and provide constitutionally adequate mental-health treatment at Indiana State Prison. The Warden stated that he had recommended Arbuckle's transfer to Miami Correctional Facility. Arbuckle subsequently filed a notice of change of address showing that he had moved to that facility, and the record contained no indication that he was likely to be transferred back.

PROCEDURAL HISTORY

The court granted Arbuckle leave to proceed only on an official-capacity claim for injunctive relief concerning protection from attack and constitutionally adequate mental-health treatment. The Warden responded to the preliminary-injunction motion and stated that he had recommended Arbuckle's transfer to Miami Correctional Facility. Arbuckle then filed a notice showing that he had been transferred but did not argue that he was likely to return to Indiana State Prison. The court concluded that the requested injunctive relief and the case were moot and dismissed the action.

DISPOSITION

dismissed

CASES CITED

- Higgason v. Farley, 83 F.3d 807, 811 (7th Cir. 1996)

- E.F.L. v. Prim, 986 F.3d 959, 962 (7th Cir. 2021)
- Brown v. Bartholomew Consol. Sch. Corp., 442 F.3d 588, 596 (7th Cir. 2006)

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