

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
TENNESSEE, WESTERN DIVISION

Doyle v. Harrison

No. 2:25-cv-03026-SHL-atc (W.D. Tenn. Jan. 26, 2026) · No. 2:25-cv-03026-SHL-atc · Decided January 26, 2026

SUMMARY

The court grants the respondent’s motion to dismiss Derrick Deon Doyle’s petition under 28 U.S.C. § 2241. The court holds that Doyle has no protected liberty interest in a particular prison facility or security classification, that the Bureau of Prisons acted within its discretion in applying the sentence-length Public Safety Factor, and that his conditions-of-confinement claims are not cognizable under § 2241. The court dismisses the petition, directs modification of the docket to reflect Doyle’s current facility, certifies that an appeal would not be taken in good faith, and denies leave to proceed in forma pauperis on appeal.

CASE DETAILS

COURT	United States District Court for the Western District of Tennessee, Western Division
WRITING FOR THE COURT	Sheryl H. Lipman
JURISDICTION	United States District Court for the Western District of Tennessee, Western Division
DECIDED	January 26, 2026
DOCKET	2:25-cv-03026-SHL-atc
DISPOSITION	dismissed
PROCEDURAL POSTURE	Doyle filed a pro se petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging the Bureau of Prisons' failure to process or grant a sentence-length Public Safety Factor waiver. The respondent moved to dismiss under Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6).
STANDARD OF REVIEW	The respondent moved to dismiss under Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6). The opinion applied the requirements for relief under 28 U.S.C. § 2241 and considered whether the petition alleged a cognizable constitutional or federal-law violation.
PRECEDENTIAL VALUE	unpublished, nonprecedential district court order

PARTIES

Derrick Deon Doyle v. Warden FNU Harrison

TOPICS

federal habeas corpus

prisoners rights

due process

appellate procedure

PRACTICE AREAS

federal habeas corpus

prisoners rights

constitutional law

appellate procedure

QUESTIONS PRESENTED

1. Whether Doyle had a protected liberty interest in a particular prison facility, custody classification, or security designation.
2. Whether the BOP's alleged misapplication of Program Statement 5100.08 constituted a violation of federal law cognizable under 28 U.S.C. § 2241.
3. Whether the BOP acted within its statutory and discretionary authority by applying the Sentence Length Public Safety Factor.
4. Whether Doyle's claims concerning medical care, transfer location, and other adverse conditions were cognizable in a § 2241 habeas petition rather than in a civil rights action.
5. Whether an appeal would be taken in good faith and whether Doyle should be permitted to proceed in forma pauperis on appeal.

HOLDINGS

1. Doyle had no protected liberty interest in being housed at a particular facility or in receiving a particular security classification, so his petition did not allege a due process violation on those grounds.
2. The BOP acted within its discretion in applying the Sentence Length Public Safety Factor to Doyle because he had more than ten years remaining on his sentence.
3. An alleged misapplication of BOP Program Statement 5100.08, standing alone, is not cognizable as a violation of federal law under § 2241.
4. Claims challenging the conditions or effects of confinement, including alleged deliberate indifference to medical needs and facility placement, must be brought in a civil rights action rather than under § 2241.
5. The court certified that an appeal would not be taken in good faith and denied Doyle leave to proceed in forma pauperis on appeal.

KEY QUOTATIONS

“Doyle would simply not be entitled to relief even if the BOP misapplied Program Statement 5100.08.” (III)

“Deliberate indifference claims, however, are conditions of confinement claims that may only be raised in a civil rights action.” (III)

“The Court therefore CERTIFIES under Rule 24(a) that any appeal would not be taken in good faith and DENIES Doyle leave to appeal in forma pauperis.” (IV)

FACTUAL BACKGROUND

Doyle was serving a 235-month federal sentence after pleading guilty to conspiracy to possess with intent to distribute, and distribution of, at least fifty grams of methamphetamine. The Bureau of Prisons applied a Sentence Length Public Safety Factor because Doyle had more than ten years remaining on his sentence, with an estimated release date of October 6, 2039. Doyle claimed that the BOP failed to process or grant his request for a waiver, preventing transfer to a facility closer to Alabama or better able to address his obstructive sleep apnea and hypertension.

PROCEDURAL HISTORY

Doyle pleaded guilty and was sentenced in the Middle District of Alabama to 235 months of imprisonment and five years of supervised release. The Eleventh Circuit dismissed his direct appeal based on the appeal waiver in his plea agreement, and Doyle did not file a § 2255 motion. He then filed this § 2241 petition in the Western District of Tennessee, where the court granted the respondent's motion to dismiss, dismissed the petition, entered judgment for the respondent, and certified that an appeal would not be taken in good faith.

DISPOSITION

dismissed

CASES CITED

- United States v. Doyle, No. 1:23-cr-00177-ECF-CWB
- Olim v. Wakinekona, 461 U.S. 238, 245 (1983)
- Ford v. Harvey, 106 F. App'x 397, 399 (6th Cir. 2004)
- Marti v. Nash, 227 F. App'x 148, 150 (3d Cir. 2007)
- Mays v. Paul, No. 5:23-00093-GFVT, 2023 WL 2905553, at *1-*2 (E.D. Ky. Mar. 28, 2023)
- Embrey v. Sepenak, No. 0:11-CV-00119-HRW, 2012 WL 1205721, at *3 (E.D. Ky. Apr. 10, 2012)
- Loper Bright Enters. v. Raimondo, 603 U.S. 369 (2024)
- Roussell v. Harrison, No. 2:25-cv-02246-SHL-cgc, 2026 WL 147838, at *3 (W.D. Tenn. Jan. 20, 2026)
- United States v. Bricker, 135 F.4th 427, 440-41 (6th Cir. 2025)
- Hutchins v. FMC Lexington, No. 5:08-393-JMH, 2008 WL 4534241, at *2 (E.D. Ky. Oct. 7, 2008)
- Reno v. Koray, 515 U.S. 50, 61 (1995)
- Gonzalez v. Doe, No. 3:09-CV-671-P ECF, 2009 WL 1704248, at *1 (N.D. Tex. June 15, 2009)
- Smith v. Warden of Duluth Prison Camp, No. 18-cv-2555 (WMW/LIB), 2019 WL 3325837, at *6 (D. Minn. Apr. 23, 2019)
- In re Owens, 525 F. App'x 287, 290 (6th Cir. 2013)
- Hutton v. Entzel, No. 25-97-DLB, 2025 WL 3211546, at *2 (E.D. Ky. Oct. 22, 2025)

- McCray v. Rios, No. 08-206-ART, 2009 WL 103602, at *4 (E.D. Ky. Jan. 14, 2009)
- Witham v. United States, 355 F.3d 501, 504 (6th Cir. 2004)
- Kincade v. Sparkman, 117 F.3d 949, 952 (6th Cir. 1997)

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