

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
WISCONSIN

Reginald Hart v. Christine Kulinski, et al.

Hart v. Kulinski · No. 25-CV-2016 · Decided January 22, 2026

SUMMARY

The United States District Court for the Eastern District of Wisconsin grants Reginald Hart leave to proceed in forma pauperis in his 42 U.S.C. § 1983 action concerning delayed probation-revocation proceedings and extradition. The court denies his request for injunctive relief under the Younger abstention doctrine, stays the action pending resolution of his state revocation proceedings, and administratively closes the case.

CASE DETAILS

COURT	United States District Court for the Eastern District of Wisconsin
WRITING FOR THE COURT	Byron B. Conway
JURISDICTION	United States District Court for the Eastern District of Wisconsin
DECIDED	January 22, 2026
DOCKET	25-CV-2016
DISPOSITION	stayed
PROCEDURAL POSTURE	A self-represented prisoner brought a 42 U.S.C. § 1983 action alleging due-process violations arising from delays in pursuing alleged Wisconsin supervision violations, issuance of a delayed probation warrant, and failure to extradite him from Georgia. The court screened the complaint, granted leave to proceed in forma pauperis, denied motions for a temporary restraining order and preliminary injunction, and stayed and administratively closed the action under Younger abstention.
STANDARD OF REVIEW	Screening under 28 U.S.C. § 1915A and the plausibility and notice-pleading standards of Federal Rule of Civil Procedure 8(a)(2); Younger abstention analysis for federal constitutional claims that may interfere with ongoing state proceedings.
PRECEDENTIAL VALUE	unpublished
PARTIES	Reginald Hart v. Christine Kulinski, et al.

TOPICS

section 1983 prisoners rights injunctions due process federal habeas corpus

PRACTICE AREAS

Civil rights Prisoner litigation Federal civil procedure Constitutional law

QUESTIONS PRESENTED

1. Whether Hart should be permitted to proceed without prepaying the filing fee.
2. Whether the complaint stated a cognizable § 1983 due-process claim based on delayed action, delayed issuance of a warrant, and failure to extradite.
3. Whether the federal court could grant temporary or preliminary injunctive relief interfering with ongoing Wisconsin revocation proceedings.
4. Whether the federal civil-rights action should be stayed rather than dismissed while the state revocation proceedings and related post-conviction and appellate proceedings remained pending.

HOLDINGS

1. Hart was granted leave to proceed without prepayment of the filing fee because he submitted the required prison trust-account documentation and had paid the initial partial filing fee.
2. The court was required to abstain under *Younger v. Harris* from deciding Hart's federal constitutional claims to the extent they could interfere with his ongoing state revocation proceedings, and it lacked authority to grant the requested temporary restraining order or preliminary injunction.
3. The federal civil-rights action was stayed and administratively closed pending resolution of Hart's state revocation proceedings, including post-conviction motions and other appellate relief, rather than dismissed.

KEY QUOTATIONS

"The Court concludes that it must abstain from hearing these issues under Younger v. Harris, 401 U.S. 37 (1971)."

"This Court does not have the authority to interfere with a state court proceeding, so Plaintiff's motion for a temporary restraining order and a preliminary injunction is denied."

FACTUAL BACKGROUND

Hart was released from Wisconsin custody onto extended supervision in 2019 and later transferred supervision to Georgia. After his 2023 arrest on Georgia charges, Wisconsin lodged a probation hold based on alleged supervision violations, but Wisconsin officials did not extradite or retrieve him after he became available. Georgia released Hart back to supervision, and Wisconsin later issued a warrant based on the same alleged violations on May 20, 2025; Hart was apprehended on October 7, 2025 and was facing revocation proceedings when he filed this action.

PROCEDURAL HISTORY

Hart filed a prisoner civil-rights complaint and moved to proceed without prepayment of the filing fee. While Hart was facing Wisconsin revocation proceedings, he sought temporary and preliminary injunctive relief against further action in those proceedings. The district court granted in forma pauperis status, denied injunctive relief, stayed the federal action pending resolution of the state revocation proceedings, and directed the clerk to administratively close the case.

DISPOSITION

stayed

REMAND INSTRUCTIONS

No remand. The clerk was directed to administratively close the case. Hart may move to reopen and lift the stay after conclusion of the state revocation proceedings, including post-conviction motions and other appellate relief.

CASES CITED

- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555, 556, 570 (2007)
- D.S. v. E. Porter County School Corp., 799 F.3d 793, 798 (7th Cir. 2015)
- Buchanan-Moore v. County of Milwaukee, 570 F.3d 824, 827 (7th Cir. 2009)
- Younger v. Harris, 401 U.S. 37, 45 (1971)
- SKS & Assocs., Inc. v. Dart, 619 F.3d 674, 677 (7th Cir. 2010)
- Shaw v. County of Milwaukee, No. 24-1410, 2022 WL 1001434, at *2 (7th Cir. Apr. 4, 2022)
- Simpson v. Rowan, 73 F.3d 134, 138 (7th Cir. 1995)