

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
VIRGINIA, ROANOKE DIVISION

Bruce A. Estes v. Virginia Department of Corrections, et al.

Estes · No. 7:25-cv-00817 · Decided June 16, 2026

SUMMARY

The court dismissed without prejudice as moot Bruce A. Estes’s motions for a preliminary injunction and temporary restraining order in his 42 U.S.C. § 1983 action alleging deliberate indifference to serious medical needs. The court concluded that Estes had received the recommended pain-management treatment, including a TENS unit, and therefore the requested injunctive relief was no longer necessary.

CASE DETAILS

COURT	United States District Court for the Western District of Virginia, Roanoke Division
WRITING FOR THE COURT	Elizabeth K. Dillon
JURISDICTION	United States District Court for the Western District of Virginia, Roanoke Division
DECIDED	June 16, 2026
DOCKET	7:25-cv-00817
DISPOSITION	dismissed
PROCEDURAL POSTURE	A pro se prisoner moved for a preliminary injunction and a temporary restraining order in a 42 U.S.C. § 1983 action alleging deliberate indifference to serious medical needs.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion
PARTIES	Bruce A. Estes v. Virginia Department of Corrections, et al.

TOPICS

- injunctions
- prisoners rights
- section 1983
- health law
- civil rights

PRACTICE AREAS

- prisoner civil rights
- injunctive relief
- medical treatment litigation

QUESTIONS PRESENTED

1. Whether Estes's motions for a preliminary injunction and temporary restraining order became moot after he received the medical treatment, including a TENS Unit, that he sought.

HOLDINGS

1. The motions for a preliminary injunction and temporary restraining order were moot because Estes had received the requested pain-management treatment, specifically a TENS Unit.

KEY QUOTATIONS

“Thus, it appears to the court that Estes’s motions for injunctive relief are moot, as he has received the pain management treatment recommended by specialists, specifically the use of a TENS Unit.”

FACTUAL BACKGROUND

Bruce A. Estes, a Virginia inmate, alleged that he had multiple herniated spinal discs and that medical specialists recommended a TENS Unit. He sought an injunction and temporary restraining order requiring medical treatment and exemption from activities involving prolonged sitting or standing. During the case, grievance records indicated that he was receiving a TENS Unit, ibuprofen, and lidocaine patches.

PROCEDURAL HISTORY

Estes filed a § 1983 complaint and moved for injunctive relief requiring medical treatment, including a TENS Unit, pain-management referral, and orthopedic consultation. After grievance materials showed that he was receiving a TENS Unit and other pain-management treatment, the district court dismissed both motions without prejudice as moot.

DISPOSITION

dismissed

CASES CITED

- Caballero v. Aranas, 2020 WL 8459158, at *3 (D. Nev. Dec. 11, 2020)