

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MICHIGAN

Rollins v. Rardin

Rollins · No. 2:25-cv-11849 · Decided January 12, 2026

SUMMARY

The United States District Court for the Eastern District of Michigan dismissed Adam James Rollins’s 28 U.S.C. § 2241 habeas petition as moot. The court concluded that Rollins’s release from federal custody to residential reentry or home confinement eliminated any live case or controversy concerning his requested relief.

CASE DETAILS

COURT	United States District Court for the Eastern District of Michigan
WRITING FOR THE COURT	Brandy R. McMillion
JURISDICTION	United States District Court for the Eastern District of Michigan
DECIDED	January 12, 2026
DOCKET	2:25-cv-11849
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner brought a pro se habeas petition under 28 U.S.C. § 2241 challenging his eligibility to receive and use sentencing credits under the First Step Act and seeking placement in a Residential Reentry Center or home confinement. Respondent moved to dismiss on mootness grounds after Petitioner was released from Bureau of Prisons custody.
STANDARD OF REVIEW	The court applied the Article III case-or-controversy requirement and determined de novo whether intervening events had rendered the habeas petition moot.
PRECEDENTIAL VALUE	Unpublished district court opinion; precedential status is unknown in the source metadata.
PARTIES	Adam James Rollins v. Eric Rardin

TOPICS

- federal habeas corpus
- motions to dismiss
- post-conviction relief
- subject matter jurisdiction
- remedies

PRACTICE AREAS

Federal habeas corpus

Mootness

Federal civil procedure

Sentencing credits

QUESTIONS PRESENTED

1. Whether Rollins's § 2241 habeas petition became moot after he was released from Bureau of Prisons custody and the court could no longer grant the requested placement relief.

HOLDINGS

1. The petition was moot because Rollins had been released to a Residential Reentry Center or home confinement, leaving no further relief that the court could grant on his habeas claims.

KEY QUOTATIONS

“Because Rollins has been released to a RRC or Home Confinement, the Court concludes that there is no longer any case or controversy for the Court to resolve.”

“As there is no further relief for Court to grant on Rollins’s habeas claims, this case has been rendered moot; and the habeas petition must be dismissed on that basis.”

FACTUAL BACKGROUND

Rollins was a federal inmate serving a 120-month sentence for a federal drug offense at FCI Milan, Michigan. His § 2241 petition challenged his eligibility to receive and use sentencing credits under the First Step Act and sought transfer to a Residential Reentry Center or home confinement. During the litigation, Bureau of Prisons records showed that he was no longer in BOP custody and that he was located at Minneapolis RRM, which manages offenders in residential reentry centers or on home confinement.

PROCEDURAL HISTORY

Rollins filed a § 2241 habeas petition while serving a federal sentence at FCI Milan. After his release to a Residential Reentry Center or home confinement, Respondent moved to dismiss because the requested relief was no longer available. The district court granted the motion and dismissed the petition as moot, closing the case.

DISPOSITION

dismissed

CASES CITED

- United States v. Juvenile Male, 564 U.S. 932, 936 (2011)
- Lewis v. Continental Bank Corp., 494 U.S. 472, 477 (1990)
- Preiser v. Newkirk, 422 U.S. 395, 401 (1975)
- Ailor v. City of Maynardville, 368 F.3d 587, 596 (6th Cir. 2004)
- Deakins v. Monaghan, 484 U.S. 193, 199 (1988)

- Thomas Sysco Food Svs. v. Martin, 983 F.2d 60, 62 (6th Cir. 1993)
- Picron-Peron v. Rison, 930 F.2d 773, 776 (9th Cir. 1991)

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