

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PRECEDENTIAL VALUE	Unpublished district court opinion; precedential status is unknown in the source metadata.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)

OPINION

Rollins

PER CURIAM.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ADAM JAMES ROLLINS,

Petitioner, Case No. 2:25-cv-11849 v. Hon. Brandy R. McMillion United States District Judge
ERIC RARDIN,

Respondent. _____/

OPINION & ORDER GRANTING RESPONDENT’S MOTION TO DISMISS (ECF NO.13) AND DISMISSING HABEAS PETITION

This is a pro se habeas case brought pursuant to 28 U.S.C. § 2241. At the time he instituted this action, Petitioner Adam James Rollins (“Rollins”) was a federal inmate serving a 120-month sentence for a federal drug offense at the Federal Correctional Institution in Milan, Michigan. See generally ECF No. 1. In his habeas petition and supporting brief, he raises claims concerning his eligibility to receive and use sentencing credits under the First Step Act. *Id.* His requested relief is to have BOP release him to a Residential Reentry Center (“RRC”) or to Home Confinement. *Id.* Respondent recently filed a Motion to Dismiss the Petition on mootness grounds because Petitioner’s was no longer in BOP custody. See ECF No. 13, PageID.57. They argue that Rollins concedes as much by filing a Notice of Change of Address. See *id.* (citing ECF No. 12, PageID.53) (stating Rollins address would change effective September 11, 2025 to a residential address in Iowa). Article III, § 2 of the United States Constitution requires the existence of a case or controversy through all stages of federal judicial proceedings. *United States v. Juvenile Male*, 564 U.S. 932, 936 (2011). This means that, throughout the litigation, the plaintiff or petitioner “must have suffered, or be threatened with, an actual injury traceable to the defendant and likely to be redressed by a favorable judicial decision.” *Lewis v. Continental Bank Corp.*, 494 U.S. 472, 477 (1990); see also *Preiser v. Newkirk*, 422 U.S. 395, 401 (1975). If an event occurs subsequent to the filing of a lawsuit which deprives a court of the ability to provide meaningful relief, the case becomes moot and is subject to dismissal. *Ailor v. City of Maynardville*, 368 F.3d 587, 596 (6th Cir. 2004). Similarly, a claim becomes moot when the controversy between the parties is no longer alive because the party seeking relief has obtained the relief requested. *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) (habeas claim is moot when the court no

longer has power to grant the requested relief). Respondent argues that this case is moot, as Rollins has already been released from federal custody. See ECF No. 13, PageID.57. As of the date of filing, Respondent attaches a printout from the BOP's Inmate Locator database which indicates that Petitioner was "NOT IN BOP CUSTODY". See ECF No. 13-1, PageID.61. The Court also searched the BOP Inmate Locator and notes that Rollin is listed as "Located at: Minneapolis RRM." See Petitioner's Inmate Profile, BOP Inmate Locator, <https://www.bop.gov/inmateloc/> (accessed on Jan. 11, 2026).¹ 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. Accordingly, the Court GRANTS Respondent's Motion to Dismiss (ECF No. 13). IT IS HEREBY ORDERED that the Petition for Writ of Habeas Corpus (ECF No. 1) is DISMISSED. This is a final order that closes the case. IT IS SO ORDERED. Dated: January 12, 2026 s/Brandy R. McMillion Detroit, Michigan HON. BRANDY R. MCMILLION United States District Judge 1 Minneapolis RRM is the Residential Reentry Management Field Office for the North Central Region, located in Minneapolis, MN. The RRM is responsible for managing federal offenders in RRCs or on Home Confinement. See <https://www.bop.gov/locations/ccm/cms/>