

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA, FORT WAYNE DIVISION

Jonathan Lane v. Sheriff

Lane · No. 1:26-CV-43-GSL-JEM · Decided March 4, 2026

SUMMARY

The United States District Court for the Northern District of Indiana dismissed Jonathan Lane’s Section 2254 habeas petition challenging his pretrial detention. The court held that Lane’s claims became moot after his state-court convictions and denied a certificate of appealability.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana, Fort Wayne Division
WRITING FOR THE COURT	Gretchen S. Lund
JURISDICTION	United States District Court for the Northern District of Indiana, Fort Wayne Division
DECIDED	March 4, 2026
DOCKET	1:26-CV-43-GSL-JEM
DISPOSITION	dismissed
PROCEDURAL POSTURE	A self-represented state prisoner filed a federal habeas petition challenging his pretrial detention. The district court dismissed the petition under Rule 4 of the Rules Governing Section 2254 Cases after taking judicial notice that the petitioner had been convicted in state court.
STANDARD OF REVIEW	Under Rule 4 of the Rules Governing Section 2254 Cases, the court must dismiss a petition if it plainly appears from the petition and attached exhibits that the petitioner is not entitled to relief. For a certificate of appealability after a procedural dismissal, the petitioner must show that reasonable jurists could debate both the procedural ruling and whether the petition states a valid constitutional claim.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Jonathan Lane v. Sheriff

TOPICS

federal habeas corpus

habeas corpus

post-conviction relief

criminal procedure

probable cause

PRACTICE AREAS

federal habeas corpus

criminal procedure

post-conviction relief

QUESTIONS PRESENTED

1. Whether Lane's federal habeas claims challenging his pretrial detention remained justiciable after the state court convicted him.
2. Whether Lane was entitled to a certificate of appealability after dismissal of the petition on mootness grounds.

HOLDINGS

1. A challenge to pretrial detention becomes moot once the petitioner is convicted because the pretrial detention is no longer ongoing and the petitioner lacks a legally cognizable interest in the outcome.
2. Lane was not entitled to a certificate of appealability because reasonable jurists would not debate the correctness of the mootness ruling or whether the petition stated a valid habeas claim.

KEY QUOTATIONS

"In general a case becomes moot when the issues presented are no longer live or the parties lack a legally cognizable interest in the outcome. It would seem clear that under this general rule Hunt's claim to pretrial bail was moot once he was convicted."

FACTUAL BACKGROUND

Lane was detained before trial in an Indiana criminal case and filed a federal habeas petition challenging that detention based on alleged problems with the police investigation and the strength of the prosecution's case. The court construed those allegations as a claim that Lane was being held without probable cause. The Allen Superior Court subsequently held a bench trial and convicted Lane of conversion, criminal mischief, and attempted residential entry.

PROCEDURAL HISTORY

Lane filed a habeas petition concerning his pretrial detention in connection with an Allen Superior Court criminal case. While the federal petition was pending, the Allen Superior Court held a bench trial on March 3, 2026, and convicted Lane of conversion, criminal mischief, and attempted residential entry. The federal court concluded that the conviction mooted Lane's pretrial-detention claims, dismissed the petition, denied a certificate of appealability, and directed the clerk to close the case.

DISPOSITION

dismissed

CASES CITED

- Murphy v. Hunt, 455 U.S. 478, 481 (1982)
- Jackson v. Clements, 796 F.3d 841, 843 (7th Cir. 2015)
- Slack v. McDaniel, 529 U.S. 473, 484 (2000)

OPINION

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF INDIANA FORT WAYNE
DIVISION JONATHAN LANE, Petitioner, v. CAUSE NO. 1:26-CV-43-GSL-JEM SHERIFF,
Respondent. OPINION AND ORDER Jonathan Lane, a prisoner without a lawyer, filed a habeas
petition challenging his pretrial detention in connection with Case No. 02D05-2512-F5-453 filed
in the Allen Superior Court.

Pursuant to Section 2254 Habeas Corpus Rule 4, the court must dismiss the petition “[i]f it plainly
appears from the petition and any attached exhibits that the petitioner is not entitled to relief in the
district court.” In the petition, Lane asserts that he is entitled to habeas relief due to issues with the
police investigation and the strength of the prosecution’s case against him, which the court
construes as claim that Lane is being unlawfully detained without probable cause.

According to the electronic docket for the State courts, on March 3, 2026, the Allen Superior
Court held a bench trial and convicted Lane of conversion, criminal mischief, and attempted
residential entry.¹ As a result, Lane cannot proceed on his claims challenging his pretrial detention
because his conviction rendered any such 1 Pursuant to Fed. R. Evid. 201, the court takes judicial
notice of the electronic dockets for the Indiana courts, which are available at
<https://public.courts.in.gov/mycase/>. claims moot.

See Murphy v. Hunt, 455 U.S. 478, 481 (1982) (“In general a case becomes moot when the issues
presented are no longer live or the parties lack a legally cognizable interest in the outcome. It
would seem clear that under this general rule Hunt’s claim to pretrial bail was moot once he was
convicted.”); Jackson v. Clements, 796 F.3d 841, 843 (7th Cir. 2015) (“Once Mr. Jackson was
convicted, the claims concerning his pre-trial confinement became moot.’).

Because the claims are moot, the court will dismiss the habeas petition. Pursuant to Section 2254
Habeas Corpus Rule 11, the court must consider whether to grant or deny a certificate of
appealability. To obtain a certificate of appealability when a petition is dismissed on procedural
grounds, the petitioner must show that reasonable jurists would find it debatable (1) whether the
court was correct in its procedural ruling and (2) whether the petition states a valid claim for denial
of a constitutional right.

Slack v. McDaniel, 529 U.S. 473, 484 (2000). Here, there is no basis for finding that jurists of
reason would debate the correctness of this procedural ruling or whether the petition states a valid
habeas claim. Therefore, the court denies Lane a certificate of appealability.

For these reasons, the court: (1) DISMISSES the petition (ECF 1) pursuant to Rule 4 of the Rules Governing Section 2254 Cases because the claim is moot; (2) DENIES Jonathan Lane a certificate of appealability pursuant to Section 2254 Habeas Corpus Rule 11; and (3) DIRECTS the clerk to close this case. SO ORDERED on March 4, 2026 /s/Gretchen S. Lund JUDGE UNITED STATES DISTRICT COURT