

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA

MacDermott v. Rardin

Civil No. 25-05 (JRT/DLM) (D. Minn. Dec. 10, 2025) · No. 0:25-cv-00005 · Decided December 10, 2025

SUMMARY

The United States District Court for the District of Minnesota dismissed without prejudice Troy Nicholas MacDermott’s 28 U.S.C. § 2241 habeas action challenging the revocation of 27 days of good-time credit. The court held that MacDermott’s release from custody rendered the petition moot and that no mootness exception applied. The court also concluded that, even if the case were not moot, the challenged disciplinary determination was supported by some evidence.

CASE DETAILS

COURT	United States District Court for the District of Minnesota
WRITING FOR THE COURT	John R. Tunheim
JURISDICTION	United States District Court for the District of Minnesota
DECIDED	December 10, 2025
DOCKET	0:25-cv-00005
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner sought habeas relief under 28 U.S.C. § 2241 from a prison disciplinary proceeding that revoked 27 days of good-time credit. After a magistrate judge recommended dismissal and while Petitioner's objections and postjudgment motions were pending, Petitioner was released from custody. The district court determined that release mooted the petition and dismissed the action without prejudice.
STANDARD OF REVIEW	The court liberally construed the pro se Rule 59(e) motion as an objection to the magistrate judge's R&R and reviewed properly objected-to portions de novo under Federal Rule of Civil Procedure 72(b)(3).
PRECEDENTIAL VALUE	Unpublished district court memorandum opinion; limited persuasive value
PARTIES	Troy Nicholas MacDermott v. Jared Rardin, Warden

TOPICS

federal habeas corpus

post-conviction relief

administrative procedure act

judicial review of agency action

civil procedure

PRACTICE AREAS

Federal habeas corpus

Mootness

Prison disciplinary proceedings

Administrative law

Civil procedure

QUESTIONS PRESENTED

1. Whether MacDermott's release from federal custody rendered his § 2241 petition moot.
2. Whether any exception to mootness applied after MacDermott's release.
3. Whether the court should liberally construe MacDermott's Rule 59(e) motion as an objection to the magistrate judge's Report and Recommendation and review the properly objected-to portions de novo.
4. Whether, assuming the case was not moot, the objections failed because the Administrative Procedure Act does not permit review of the loss of good-time credit and the disciplinary determination was supported by some evidence.

HOLDINGS

1. MacDermott's release from custody rendered his habeas petition moot because the court could no longer grant him effective relief concerning the revoked good-time credit.
2. None of the recognized mootness exceptions applied because MacDermott identified no cognizable collateral consequences, no reasonable expectation of repetition, no continuing voluntary cessation, and no class-action claim.
3. The Administrative Procedure Act does not apply to claims concerning the loss of good-time credit because 18 U.S.C. § 3625 precludes APA review of substantive Bureau of Prisons determinations involving such credits.
4. The disciplinary determination was supported by some evidence in the record.
5. A pro se Rule 59(e) motion may be liberally construed as an objection to an R&R, and properly objected-to portions of a dispositive R&R receive de novo review.

KEY QUOTATIONS

“This matter became moot when MacDermott was released from custody on October 1, 2025 because the Court “can no longer grant effective relief” to MacDermott, since he no longer in BOP custody.”

(Discussion, II. Analysis)

“Since Petitioner has been released from custody, MacDermott’s habeas petition is moot.” (Conclusion)

FACTUAL BACKGROUND

MacDermott was serving an 86-month federal prison sentence followed by 40 years of supervised release. After a prison incident, the Bureau of Prisons revoked 27 days of good-time credit, and MacDermott filed a § 2241

petition seeking restoration of those days and earlier release. He was released from custody on October 1, 2025, before the court resolved his objections and related motions.

PROCEDURAL HISTORY

MacDermott filed a § 2241 petition on January 2, 2025. Magistrate Judge Douglas L. Micko issued a Report and Recommendation recommending denial of the petition and dismissal with prejudice; the district court later adopted an R&R concerning preliminary injunctive relief. MacDermott filed a Rule 59(e) motion and a request for equitable tolling, but the court learned that he had been released on October 1, 2025. The court rejected the R&R as moot, denied the petition and related motions as moot, and dismissed the action without prejudice.

DISPOSITION

dismissed

CASES CITED

- MacDermott v. Rardin, No. 25-5, 2025 WL 1400337 (D. Minn. May 8, 2025)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Mayer v. Walvatne, No. 07-1958, 2008 WL 4527774, at *2 (D. Minn. Sept. 28, 2008)
- Brazil v. Ark. Dep't of Hum. Servs., 892 F.3d 957, 959 (8th Cir. 2018)
- In re Search Warrants Issued in Connection with Investigation of S. Cent. Career Ctr., W. Plains, Mo., 487 F.3d 1190, 1192–93 (8th Cir. 2007)
- Ali v. Cangemi, 419 F.3d 722, 723 (8th Cir. 2005)
- Ahmed v. Sessions, No. 16-2124, 2017 WL 3267738, at *2 (D. Minn. July 11, 2017), R&R adopted, 2017 WL 3268176 (D. Minn. July 31, 2017)
- Riley v. I.N.S., 310 F.3d 1253, 1257 (10th Cir. 2002)
- Bailey v. Southerland, 821 F.2d 277, 279 (5th Cir. 1987)
- James v. Outlaw, 142 F. App'x 274, 275 (8th Cir. 2005)
- United States v. Johnson, 529 U.S. 53, 60 (2000)
- Alvarado-Ortiz, 2022 WL 4358112, at *2
- Kargbo v. Brott, No. 15-2713, 2016 WL 3676162, at *2 (D. Minn. July 6, 2016)
- Hernandez-Pacheco v. Fisher, No. 10-2088, 2011 WL 4929417, at *1 n.2 (D. Minn. Sept. 12, 2011), R&R adopted, 2011 WL 4808187 (D. Minn. Oct. 11, 2011)
- Jordan v. Wiley, 411 F. App'x 201 (10th Cir. 2011)
- Ward v. King, No. 24-114, 2024 WL 5340680, at *4 (D. Minn. Nov. 27, 2024), citing Phillips v. Norris, 320 F.3d 844, 847 (8th Cir. 2003), R&R adopted, 2025 WL 240771 (D. Minn. Jan. 17, 2025)
- Phillips v. Norris, 320 F.3d 844, 847 (8th Cir. 2003)
- Superintendent, Mass. Corr. Inst., Walpole v. Hill, 472 U.S. 445, 454 (1985)
- Lao v. Schult, No. 9:09-00653, 2010 WL 743757 (N.D.N.Y. Feb. 25, 2010)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/state/united-states-district-court-for-the-district-of-minnesota-united-states-district-court-for-the-dist/2025/macdermott-v-rardin-flno0kru>