

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

Christian Thomas Nealson v. Lt. Day, et al.

Nealson · No. 7:25-cv-00719 · Decided December 18, 2025

SUMMARY

The United States District Court for the Western District of Virginia denied Christian Thomas Nealson's motion for a preliminary injunction in his 42 U.S.C. § 1983 action against correctional officers at Green Rock Correctional Center. The court concluded that Nealson had not demonstrated the requirements for preliminary relief under *Winter v. Natural Resources Defense Council* and that his transfer to another facility rendered any Green Rock-specific injunctive relief moot.

CASE DETAILS

COURT	United States District Court for the Western District of Virginia, Roanoke Division
WRITING FOR THE COURT	Michael F. Urbanski
JURISDICTION	United States District Court for the Western District of Virginia, Roanoke Division
DECIDED	December 18, 2025
DOCKET	7:25-cv-00719
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff filed a civil-rights action under 42 U.S.C. § 1983 and moved for a preliminary injunction. The district court denied the motion.
STANDARD OF REVIEW	A preliminary injunction requires a clear showing that the plaintiff is entitled to relief and satisfaction of each of four factors: likelihood of success on the merits, likelihood of irreparable harm absent relief, balance of the equities, and the public interest.
PRECEDENTIAL VALUE	Unpublished district-court order; precedential status is not identified in the source.
PARTIES	Christian Thomas Nealson v. Lt. Day, et al.

TOPICS

- injunctions
- prisoners rights
- section 1983
- civil rights
- equitable relief

PRACTICE AREAS

civil rights

prisoners rights

injunctions

section 1983

QUESTIONS PRESENTED

1. Whether Nealson established entitlement to a preliminary injunction under the four-factor test governing preliminary injunctive relief.
2. Whether Nealson's transfer from Green Rock rendered moot any request for injunctive relief specific to that facility.

HOLDINGS

1. The motion for preliminary injunctive relief was denied because Nealson did not address or make a clear showing as to all four required preliminary-injunction factors, including likely irreparable harm.
2. Any request for injunctive relief specific to Green Rock appeared to be moot because Nealson had been transferred from that facility.

KEY QUOTATIONS

“A preliminary injunction is an “extraordinary remedy that may only be awarded upon a clear showing that the plaintiff is entitled to such relief.”” (Order)

“A plaintiff seeking such relief “must establish that he is likely to succeed on the merits, that he is likely to suffer irreparable harm in the absence of preliminary relief, that the balance of the equities tips in his favor, and that an injunction is in the public interest.”” (Order)

“In Winter, the Supreme Court “made clear that each of these four factors must be satisfied to obtain preliminary injunctive relief.”” (Order)

“The Clerk is directed to send a copy of this order to Nealson.” (Order)

FACTUAL BACKGROUND

Nealson alleged that he had been placed in disciplinary segregation at Green Rock Correctional Center based on a false charge and without due process. He sought preliminary injunctive relief. The record indicated that he was no longer incarcerated at Green Rock and had been transferred to Sussex I State Prison.

PROCEDURAL HISTORY

Nealson, a Virginia inmate proceeding pro se, filed this § 1983 action against correctional officers at Green Rock Correctional Center and sought preliminary injunctive relief. The court reviewed the motion and record, determined that Nealson had not satisfied the requirements for preliminary relief, and further concluded that his transfer from Green Rock appeared to moot any request for relief directed specifically to that facility.

DISPOSITION

CASES CITED

- Winter v. Natural Resources Defense Council, Inc., 555 U.S. 7 (2008)
- Lisa Henderson v. Bluefield Hospital Co., LLC, Henderson v. Bluefield Hospital Co., LLC, 902 F.3d 432 (4th Cir. 2018)
- Rendelman v. Rouse, 569 F.3d 182 (4th Cir. 2009)

OPINION

ULERN OD UPPIUL □□□□ Viol. UCU AT ROANOKE, VA FILED December 18, 2025 IN THE UNITED STATES DISTRICT COURT —jaupa a AUSTIN, CLERK FOR THE WESTERN DISTRICT OF VIRGINIA py. IAB ROANOKE DIVISION SSEPUTY CLERK CHRISTIAN THOMAS NEALSON,) Plaintiff,) Civil Action No. 7:25-cv-00719)) By: Michael F. Urbanski LT. DAY, et al.,) Senior United States District Judge Defendants.) ORDER Christian Thomas Nealson, a Virginia inmate proceeding pro se, filed this civil action under 42 U.S.C. § 1983 against correctional officers at Green Rock Correctional Center (Green Rock), Along with his complaint, Nealson filed a motion for preliminary injunctive relief, ECF No. 2, which is presently before the court.

For the following reasons, the motion is DENIED. A preliminary injunction is an “extraordinary remedy that may only be awarded upon a clear showing that the plaintiff is entitled to such relief.” Winter v. Nat. Res. Def. Council, Inc., 555 U.S. 7, 22 (2008). A plaintiff seeking such relief “must establish that he is likely to succeed on the merits, that he is likely to suffer irreparable harm in the absence of preliminary relief, that the balance of the equities tips in his favor, and that an injunction is in the public interest.” Id, at 20.

In Winter, the Supreme Court “made clear that each of these four factors must be satisfied to obtain preliminary injunctive relief.” Henderson v. Bluefield Hosp. Co., LLC, 902 F.3d 432, 439 (4th Cir. 2018) (emphasis in original) (citing Winter, 555 U.S. at 20, 23).

Having reviewed the record, the court concludes that Nealson’s motion must be denied. First, the motion does not address all of the requirements set forth in Winter, much less make a “clear showing” as to each requirement. Winter, 555 U.S. at 22.

For instance, while Nealson alleges that he was placed in disciplinary segregation based on a false charge and without receiving due process, he has not shown that irreparable harm is likely in the absence of preliminary injunctive relief. See id. (“Our frequently reiterated standard requires plaintiffs seeking preliminary relief to demonstrate that irreparable injury is likely in the absence of an injunction.”) (emphasis in original).

Additionally, the record reflects that Nealson is no longer incarcerated at Green Rock. According to a notice filed on November 14, 2025, Nealon is now confined at Sussex I State Prison. Consequently, it appears that any request for injunctive relief specific to Green Rock has been rendered moot. See *Rendelman v. Rouse*, 569 F.3d 182, 186 (4th Cir. 2009) (“[A]s a general rule, a prisoner’s transfer or release from a particular prison moots his claims for injunctive... relief with respect to his incarceration there.”).

Por these reasons, Nealson’s motion for preliminary injunctive relief, ECF No. 2, is DENIED. The Clerk is directed to send a copy of this order to Nealson. It is so ORDERED. Entered: December 18, 2025 Michael F. Urbanski U.S. District Judge 2025.12.18 17:19:24 -05'00' Michael P. Urbanski Senior United States District Judge