

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA

Christopher Coats v. Warden

No. 3:26-CV-481-PPS-AZ (N.D. Ind. May 21, 2026) · No. 3:26-CV-481-PPS-AZ · Decided May 21, 2026

SUMMARY

The United States District Court for the Northern District of Indiana dismissed Christopher Coats's habeas corpus petition challenging a prison disciplinary conviction because the proceeding did not lengthen the duration of his confinement. The court also directed the clerk to close the case and denied Coats leave to proceed in forma pauperis on appeal.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana
WRITING FOR THE COURT	Philip P. Simon
JURISDICTION	United States District Court for the Northern District of Indiana
DECIDED	May 21, 2026
DOCKET	3:26-CV-481-PPS-AZ
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner sought federal habeas corpus relief under 28 U.S.C. § 2254 from a prison disciplinary conviction. The district court dismissed the petition at screening under Rule 4 because the disciplinary proceeding did not lengthen the duration of his confinement.
STANDARD OF REVIEW	Under Section 2254 Habeas Corpus Rule 4, the court dismisses a petition at screening when it plainly appears from the petition and attached exhibits that the petitioner is not entitled to relief.
PRECEDENTIAL VALUE	Unknown
PARTIES	Christopher Coats v. Warden

TOPICS

- federal habeas corpus
- post-conviction relief
- motions to dismiss
- appellate procedure
- standard of review

PRACTICE AREAS

- federal habeas corpus
- prison disciplinary proceedings
- appellate procedure

QUESTIONS PRESENTED

1. Whether a prison disciplinary proceeding is cognizable in federal habeas corpus when it does not lengthen the duration of the prisoner's confinement.
2. Whether the petition should be dismissed at screening under Section 2254 Habeas Corpus Rule 4.
3. Whether a certificate of appealability is required to appeal the decision and whether Coats may proceed in forma pauperis on appeal.

HOLDINGS

1. A prison disciplinary action may be challenged in a habeas corpus proceeding only when it results in the lengthening of the duration of confinement. Because Coats received neither a loss of earned credit time nor a demotion in credit class, his disciplinary proceeding did not lengthen his confinement and was not cognizable in habeas corpus.
2. A habeas corpus petition must be dismissed under Section 2254 Habeas Corpus Rule 4 when it plainly appears from the petition and attached exhibits that the petitioner is not entitled to relief.
3. A certificate of appealability was not required because Coats was challenging a prison disciplinary proceeding.
4. Coats could not proceed in forma pauperis on appeal because an appeal could not be taken in good faith.

KEY QUOTATIONS

“A prison disciplinary action can only be challenged in a habeas corpus proceeding where it results in the lengthening of the duration of confinement.”

“it plainly appears from the petition and any attached exhibits that the petitioner is not entitled to relief in the district court.”

FACTUAL BACKGROUND

A prison disciplinary hearing officer found Christopher Coats guilty of fleeing in violation of prison offense B-235 on February 4, 2026, in disciplinary case WCC 25-11-7593. Coats was not sanctioned with a loss of earned credit time or a demotion in credit class, so the disciplinary proceeding did not lengthen the duration of his confinement.

PROCEDURAL HISTORY

Coats filed a habeas corpus petition challenging a prison disciplinary hearing in which he was found guilty of fleeing. Because he received neither a loss of earned credit time nor a demotion in credit class, the court dismissed the petition under Rule 4, directed entry of judgment, closed the case, and denied leave to proceed in forma pauperis on appeal.

DISPOSITION

dismissed

CASES CITED

- Hadley v. Holmes, 341 F.3d 661, 664 (7th Cir. 2003)
- Evans v. Circuit Court, 569 F.3d 665, 666 (7th Cir. 2009)

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