

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF CALIFORNIA

Ronald Fabian Parrales-Mero v. Warden

No. 1:23-cv-00339-CDB (HC), United States District Court for the Eastern District of California (July 25, 2025)

SUMMARY

The magistrate judge recommends dismissing Ronald Fabian Parrales-Mero’s 28 U.S.C. § 2241 petition as moot. The petition sought First Step Act earned time credits, but the court determined that Petitioner’s release from custody eliminated any available habeas relief and recommends dismissal with prejudice.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	July 25, 2025
DOCKET	1:23-cv-00339-CDB (HC)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Federal prisoner filed a pro se petition for a writ of habeas corpus under 28 U.S.C. § 2241 seeking earned time credits under the First Step Act. After the Bureau of Prisons released him from custody, the magistrate judge issued findings and recommendations recommending dismissal with prejudice as moot.
STANDARD OF REVIEW	Under Habeas Rule 4, the court must examine the petition and order a response unless it plainly appears that the petitioner is not entitled to relief.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Ronald Fabian Parrales-Mero v. Warden

TOPICS

- federal habeas corpus
- post-conviction relief
- sentence modification
- immigration
- civil procedure

PRACTICE AREAS

- Federal habeas corpus
- Post-conviction relief
- Federal sentencing
- Immigration-related detention

QUESTIONS PRESENTED

1. Whether Petitioner's § 2241 petition seeking earned time credits became moot after his release from federal custody.

HOLDINGS

1. A habeas petition seeking earned time credits to facilitate earlier release is moot when the petitioner has been released from custody and the court can no longer grant the requested relief.

KEY QUOTATIONS

“Because Petitioner has been released from custody, the Court is unable to grant him the relief he seeks -- specifically, the award of ETCs that would permit Petitioner to seek early release. Accordingly, his petition is moot and must be dismissed.” (at 3)

FACTUAL BACKGROUND

Petitioner, a federal prisoner subject to an immigration detainer, sought earned time credits under the First Step Act and asserted that the credits would allow earlier transfer to supervised release or prerelease custody. He filed the petition while housed at FCI Mendota. Bureau of Prisons records showed that he was released from custody on June 16, 2023, and he did not respond to the court's order to show cause regarding mootness.

PROCEDURAL HISTORY

Petitioner filed the § 2241 petition on March 7, 2023, while confined at FCI Mendota. After determining from the Bureau of Prisons inmate locator that Petitioner had been released on June 16, 2023, the court issued an order to show cause why the petition should not be dismissed as moot. Petitioner did not respond, and the show-cause order was returned as undeliverable. The magistrate judge recommended dismissal with prejudice and advised that objections could be filed within 14 days for review by an assigned district judge.

DISPOSITION

dismissed

CASES CITED

- Valdez v. Montgomery, 918 F.3d 687, 693 (9th Cir. 2019)
- Boyd v. Thompson, 147 F.3d 1124, 1127 (9th Cir. 1998)
- Jarvis v. Nelson, 440 F.2d 13, 14 (9th Cir. 1971)
- Harrison v. Ollison, 519 F.3d 952, 955 (9th Cir. 2008)
- Alaimalo v. United States, 645 F.3d 1042, 1046 (9th Cir. 2011)
- Hernandez v. Campbell, 204 F.3d 861, 864 (9th Cir. 2000)
- Zavala v. Ives, 785 F.3d 367, 370 n.3 (9th Cir. 2015)
- Daniels-Hall v. National Education Association, 629 F.3d 992, 998-99 (9th Cir. 2010)
- Munoz v. Rowland, 104 F.3d 1096, 1098 (9th Cir. 1997)

- Johnson v. Matevousian, 745 Fed. Appx. 780, 781 (9th Cir. 2018)
- Sila v. Warden, No. EDCV 22-1632 RSWL (AS), 2023 WL 2504476, at *2-3 (C.D. Cal. Feb. 13, 2023)
- Wilkerson v. Wheeler, 772 F.3d 834, 839 (9th Cir. 2014)

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