

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA,
HELENA DIVISION

Travis Wayne Hatfield v. Dr. Paul Rees

Hatfield · No. CV 24-84-H-SPW · Decided May 4, 2026

SUMMARY

The United States District Court for the District of Montana denied Travis Wayne Hatfield’s motion for a preliminary injunction concerning medical care while incarcerated. The court held that Hatfield had not shown a likelihood of success on his Eighth Amendment deliberate-indifference claim or a likelihood of irreparable harm, and that the balance of equities and public interest weighed against the requested mandatory relief. The court also explained that release from custody was unavailable because the statutory prerequisites for a prisoner-release order had not been met.

CASE DETAILS

COURT	United States District Court for the District of Montana, Helena Division
WRITING FOR THE COURT	Susan P. Watters
JURISDICTION	United States District Court for the District of Montana, Helena Division
DECIDED	May 4, 2026
DOCKET	CV 24-84-H-SPW
DISPOSITION	denied
PROCEDURAL POSTURE	Plaintiff moved for a preliminary injunction seeking release from the Department of Corrections and transfer to the Department of Veterans Affairs for medical treatment. The court denied the motion.
STANDARD OF REVIEW	A preliminary injunction requires a clear showing that the movant is entitled to relief and requires proof of likelihood of success on the merits, likelihood of irreparable harm, that the balance of equities favors relief, and that an injunction is in the public interest. Under the PLRA, prison-related preliminary relief must be narrowly drawn, extend no further than necessary to correct the violation, and use the least intrusive means necessary.
PRECEDENTIAL VALUE	Unpublished district court order; precedential status not stated

PARTIES

Travis Wayne Hatfield v. Dr. Paul Rees

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prisoners rights

injunctions

cruel and unusual punishment

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civil procedure

QUESTIONS PRESENTED

1. Whether Hatfield established a likelihood of success on his Eighth Amendment deliberate-indifference claim sufficient to support a preliminary injunction.
2. Whether Hatfield established a likelihood of irreparable harm absent preliminary relief.
3. Whether the balance of equities and the public interest favored a mandatory injunction directing prison officials to provide specified medical care or release Hatfield from custody.
4. Whether the court could order Hatfield's release from custody as preliminary relief under the Prison Litigation Reform Act without a prior order for less intrusive relief and without convening a three-judge district court.

HOLDINGS

1. Hatfield failed to show a likelihood of success on the merits because his evidence established a serious medical need but did not show that Dr. Rees acted with deliberate indifference or that the chosen course of treatment was medically unacceptable and selected in conscious disregard of an excessive risk.
2. Hatfield failed to establish a likelihood of irreparable harm because he did not show that a specific medical course was required or that failure to provide it immediately would cause irreparable injury.
3. The court could not grant Hatfield's requested release because the PLRA requires a prior order for less intrusive relief that failed to remedy the deprivation, and authority to order prisoner release as a remedy for a systemic Eighth Amendment violation is reserved to a three-judge district court.
4. The balance of equities and public interest weighed against granting a mandatory preliminary injunction directing the prison to provide the medical care Hatfield requested.

KEY QUOTATIONS

"To merit the extraordinary award of a preliminary injunction, the supporting materials presented to the court must be based on evidence not speculation." (Analysis, Likelihood of Success on the Merits)

"Issuing a preliminary injunction based only on a possibility of irreparable harm is inconsistent with our characterization of injunctive relief as an extraordinary remedy that may only be awarded upon a clear showing that the plaintiff is entitled to such relief." (Analysis, Likelihood of Irreparable Harm)

“Hatfield’s motion for a preliminary injunction is denied.” (Disposition)

FACTUAL BACKGROUND

Hatfield, who was incarcerated at the Riverside Special Needs Unit at Montana State Prison, alleged inadequate medical care for an ulcerated wound existing since 2023. He experienced five septic events requiring surgery and hospitalization and alleged that an outside provider had suggested a particular surgery after which Dr. Rees removed him from that provider's care. The medical records submitted in support of the injunction referred to possible treatment and specialist care but did not affirmatively establish that the requested surgery was required or prescribed.

PROCEDURAL HISTORY

Hatfield brought a civil-rights action concerning medical care received while incarcerated at Montana State Prison and filed a Second Amended Complaint seeking injunctive relief. He then moved for a preliminary injunction, which Defendant opposed. The district court denied the motion without determining how Hatfield might fare at trial if he later produced additional supporting evidence.

DISPOSITION

denied

CASES CITED

- *Lopez v. Brewer*, 680 F.3d 1068, 1072 (9th Cir. 2012)
- *Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7, 20, 22 (2008)
- *Environmental Protection Information Center v. Carlson*, 968 F.3d 985, 989 (9th Cir. 2020)
- *Disney Enterprises, Inc. v. VidAngel, Inc.*, 869 F.3d 848, 856 (9th Cir. 2017)
- *Baird v. Bonta*, 81 F.4th 1036, 1041 (9th Cir. 2023)
- *Brown v. Plata*, 563 U.S. 493, 500 (2011)
- *Estelle v. Gamble*, 429 U.S. 97, 105-06 (1976)
- *Toussaint v. McCarthy*, 801 F.2d 1080, 1111 (9th Cir. 1986)
- *Wilhelm v. Rotman*, 680 F.3d 1113, 1122 (9th Cir. 2012)
- *Jett v. Penner*, 439 F.3d 1091, 1096 (9th Cir. 2006)
- *Colwell v. Bannister*, 763 F.3d 1060, 1066 (9th Cir. 2014)
- *Farmer v. Brennan*, 511 U.S. 825, 837 (1970)
- *Flathead-Lolo-Bitterroot Citizen Task Force v. Montana*, 98 F.4th 1180, 1198 (9th Cir. 2024)
- *Toguchi v. Chung*, 391 F.3d 1051, 1068 (9th Cir. 2004)
- *Simmons v. G. Arnett*, 47 F.4th 927, 934 (9th Cir. 2022)
- *Roman v. Wolf*, 977 F.3d 935, 940 (9th Cir. 2020)
- *Marlyn Nutraceuticals, Inc. v. Mucos Pharma GmbH & Co.*, 571 F.3d 873, 878-79 (9th Cir. 2009)

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