

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA

Jeremy D. Jones v. T. Vaught

Jones v. Vaught, Case No. 25-CV-3626 (PJS/DLM) (D. Minn. Dec. 19, 2025) · No. 25-CV-3626 (PJS/DLM) ·
Decided December 19, 2025

SUMMARY

The United States District Court for the District of Minnesota overruled Jeremy D. Jones’s objection to a magistrate judge’s Report and Recommendation and adopted the recommendation. The court dismissed Jones’s 28 U.S.C. § 2254 habeas petition without prejudice as moot, concluding that his requests to restore good-time credits and expunge disciplinary reports presented no ongoing, non-speculative collateral consequences. The court also denied related motions as moot and denied a certificate of appealability.

CASE DETAILS

COURT	United States District Court for the District of Minnesota
WRITING FOR THE COURT	Patrick J. Schiltz
JURISDICTION	United States District Court for the District of Minnesota
DECIDED	December 19, 2025
DOCKET	25-CV-3626 (PJS/DLM)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner objected to a magistrate judge's Report and Recommendation recommending denial of his 28 U.S.C. § 2254 habeas petition and dismissal without prejudice as moot. The district court conducted de novo review, overruled the objection, adopted the Report and Recommendation, and dismissed the petition without prejudice.
STANDARD OF REVIEW	De novo review of the challenged portions of the Report and Recommendation under 28 U.S.C. § 636(b)(1) and Federal Rule of Civil Procedure 72(b).
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	Jeremy D. Jones v. T. Vaught

TOPICS

federal habeas corpus

post-conviction relief

due process

motion to amend

civil procedure

PRACTICE AREAS

Federal habeas corpus

Post-conviction relief

Prisoner litigation

QUESTIONS PRESENTED

1. Whether Jones's request for restoration of good-time credits was moot after he completed the sentence during which the credits were earned.
2. Whether Jones's request to expunge two disciplinary reports remained justiciable based on alleged collateral consequences to halfway-house or home-confinement placement.
3. Whether the district court should adopt the magistrate judge's Report and Recommendation and dismiss the § 2254 petition without prejudice.

HOLDINGS

1. The request was moot because Jones had completed the prior sentence and any good-time credits earned during that sentence could not be applied to the sentence he was then serving for a supervised-release violation.
2. The expungement request was moot because Jones failed to identify an ongoing collateral consequence that was sufficiently concrete, traceable to the disciplinary reports, and likely to be redressed by expungement.
3. The objection was overruled, the Report and Recommendation was adopted, and the § 2254 petition was dismissed without prejudice as moot.

KEY QUOTATIONS

"A discharged prisoner who challenges some aspect of his completed sentence bears the burden "of identifying some ongoing collateral consequence that is traceable to the challenged portion of the sentence and likely to be redressed by a favorable judicial decision." (at 2)

"This is a highly speculative chain of reasoning, and, as post-Leonard decisions have made clear, "speculation alone does not allow [a federal court] to retain jurisdiction over a moot case." (at 5)

"Because Jones has failed to show that he currently "faces sufficient repercussions" from the challenged disciplinary reports, his request to expunge those reports is moot." (at 6)

FACTUAL BACKGROUND

Jones challenged the loss of good-time credits and two disciplinary reports issued while he was serving a prior sentence. By the time of the district court's decision, Jones had completed that sentence and was serving a sentence for a supervised-release violation. He argued that the disciplinary reports could negatively affect his placement in a halfway house or home confinement, but the record showed that the Bureau of Prisons intended to transfer him to a halfway house and Jones identified no actual impediment or delay caused by the reports.

PROCEDURAL HISTORY

Magistrate Judge Douglas L. Micko issued a September 26, 2025 Report and Recommendation recommending denial of the habeas petition and dismissal as moot. Jones objected and also sought expungement of two disciplinary reports. The district court overruled the objection, adopted the Report and Recommendation, dismissed the petition without prejudice, denied motions to add, amend, or supplement claims as moot, and denied a certificate of appealability.

DISPOSITION

dismissed

CASES CITED

- United States v. Juv. Male, 564 U.S. 932, 936 (2011)
- Spencer v. Kemna, 523 U.S. 1, 8, 17 (1998)
- Beachem v. Schriro, 141 F.3d 1292, 1293-94 (8th Cir. 1998)
- Leonard v. Nix, 55 F.3d 370, 372-73 (8th Cir. 1995)
- Heck v. Humphrey, 512 U.S. 477, 482-83, 487 (1994)
- United States v. Corrigan, 6 F.4th 819, 821 (8th Cir. 2021)
- United States v. L.C.D., 399 F. App'x 129, 131-32 (8th Cir. 2010)
- Leiter v. Nickrenz, 697 F. App'x 470 (8th Cir. 2017)