

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Gabriel Isham Pittman v. Pennsylvania Department of Corrections,
et al.

Civ. Action No. 3:24-CV-2203 · No. 3:24-CV-2203 · Decided November 21, 2025

SUMMARY

The United States District Court for the Middle District of Pennsylvania denied Gabriel Isham Pittman’s motion for relief from a prior judgment under Federal Rule of Civil Procedure 60. The court held that Pittman’s claims remained barred by Heck v. Humphrey because he had not obtained a prior ruling invalidating his conviction or sentence. The court rejected his arguments concerning the constitutionality of his sentence, Pennsylvania state-court decisions, an alleged intervening change in law, and the calculation of his parole eligibility date.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Malachy E. Mannion
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	November 21, 2025
DOCKET	3:24-CV-2203
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved under Federal Rule of Civil Procedure 60 for relief from the court’s prior judgment dismissing his prisoner civil-rights complaint without prejudice under Heck v. Humphrey. The court denied the motion.
STANDARD OF REVIEW	Relief from a final judgment under Federal Rule of Civil Procedure 60(b) is available only on one of the rule's specified grounds or, under Rule 60(b)(6), for another reason justifying relief. The court reviewed plaintiff's arguments to determine whether they supplied a sufficient basis for reconsideration.
PRECEDENTIAL VALUE	unpublished district court memorandum; nonprecedential
PARTIES	Gabriel Isham Pittman v. Pennsylvania Department of Corrections, et al.

TOPICS

motion for reconsideration

prisoners rights

section 1983

civil rights

federal habeas corpus

PRACTICE AREAS

civil rights

prisoner civil rights

federal civil procedure

post-conviction relief

QUESTIONS PRESENTED

1. Whether plaintiff established a basis under Federal Rule of Civil Procedure 60(b) for relief from the prior judgment dismissing his civil-rights action under *Heck v. Humphrey*.
2. Whether plaintiff's assertion that his sentence is unconstitutional permitted his damages claim to proceed without a prior judicial ruling invalidating the sentence.
3. Whether *Commonwealth v. Pittman*, *Gustafson v. Springfield, Inc.*, or *Herrera v. Agents of Pennsylvania Board of Probation & Parole* undermined the prior *Heck* determination.
4. Whether a claim challenging the calculation of a state prisoner's parole eligibility date is subject to *Heck*'s favorable-termination requirement.

HOLDINGS

1. A plaintiff may not avoid *Heck* merely by asserting in a civil damages action that the sentence underlying his imprisonment is unconstitutional; he must show that a prior judicial ruling has established that the conviction or sentence was invalidated.
2. The Pennsylvania Superior Court's decision in *Commonwealth v. Pittman* did not call into question or invalidate plaintiff's conviction or sentence because it affirmed dismissal of his state habeas petition as untimely.
3. *Gustafson v. Springfield, Inc.* did not provide a basis for relief because it did not address *Heck*, and a Pennsylvania Supreme Court decision could not overrule the United States Supreme Court on a federal constitutional question.
4. *Herrera* did not permit plaintiff's claim to proceed because *Herrera* concerned custody beyond a prisoner's maximum release date, whereas *Pittman* challenged detention beyond his minimum release date while serving an ongoing lawful sentence.
5. Claims challenging a state's calculation of a prisoner's parole eligibility date are subject to *Heck*'s favorable-termination requirement.

KEY QUOTATIONS

“recover damages for allegedly unconstitutional conviction or imprisonment, or for other harm caused by actions whose unlawfulness would render a conviction or sentence invalid,” (486-87)

“prove that the conviction or sentence has been reversed on direct appeal, expunged by executive order, declared invalid by a state tribunal authorized to make such determination, or called into question by a federal court’s issuance of a writ of habeas corpus.” (486-87)

FACTUAL BACKGROUND

Pittman is imprisoned under an ongoing criminal sentence and brought a civil-rights action challenging matters related to his imprisonment, including the constitutionality of his sentence and the calculation of his parole eligibility date. The court previously determined that the claims were barred by Heck because success would imply the invalidity of his conviction or sentence. Pittman argued that subsequent judicial decisions and the asserted invalidity of his sentence supplied grounds for relief from that judgment.

PROCEDURAL HISTORY

Pittman filed the action on December 20, 2024. The court dismissed it on January 21, 2025, as barred by Heck, without prejudice to refile after a favorable ruling invalidating the underlying conviction or sentence. The court denied Pittman's Rule 59 motion to alter or amend the judgment on April 30, 2025. Pittman then filed the present Rule 60 motion on May 28, 2025, which the court denied.

DISPOSITION

other

CASES CITED

- Heck v. Humphrey, 512 U.S. 477 (1994)
- Commonwealth v. Pittman, 188 A.3d 536 (Pa. Super. Ct. 2018)
- Commonwealth v. Pittman, No. 1977 MDA 2017, 2018 WL 1386793 (Pa. Super. Ct. Mar. 18, 2018)
- Gustafson v. Springfield, Inc., 333 A.3d 651 (Pa. 2025)
- Herrera v. Agents of Pa. Bd. of Probation & Parole, 132 F.4th 248, 256 (3d Cir. 2025)
- Harper v. DOC, No. 3:16-CV-2366, 2018 WL 660924, at *2 (M.D. Pa. Feb. 1, 2018)
- Cook v. Pa. DOC Personnel at SCI-Huntingdon, No. 1:11-CV-259, 2011 WL 950138, at *2 (M.D. Pa. Mar. 16, 2011)
- Benson v. N.J. State Parole Bd., 947 F. Supp. 827, 831-33 (D.N.J. 1996)