

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Cameron Charles Seaholm v. California Board of Prison Hearings

No. 5:24-cv-2517-JWH-MBK, United States District Court for the Central District of California (November 26, 2025)

SUMMARY

The Central District of California ordered Petitioner Cameron Charles Seaholm to show cause why his habeas petition challenging parole revocation should not be dismissed as moot after his release from custody. The Court explained that, absent continuing collateral consequences, unconditional release may moot a challenge to parole revocation and warned that failure to respond could lead to dismissal for failure to prosecute.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Michael B. Kaufman
JURISDICTION	United States District Court for the Central District of California
DECIDED	November 26, 2025
DOCKET	5:24-cv-2517-JWH-MBK
DISPOSITION	other
PROCEDURAL POSTURE	In a stayed state habeas action challenging parole revocation proceedings, the court ordered the petitioner to show cause why the petition should not be dismissed as moot after his release from custody.
STANDARD OF REVIEW	Article III case-or-controversy and mootness jurisdictional principles; a habeas petitioner must retain a personal stake and show a possibility of obtaining effective relief throughout the federal proceedings.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Cameron Charles Seaholm v. California Board of Prison Hearings

TOPICS

- federal habeas corpus
- subject matter jurisdiction
- civil procedure
- due process

PRACTICE AREAS

Federal habeas corpus

constitutional law

civil procedure

QUESTIONS PRESENTED

1. Whether the petition may be moot because petitioner was unconditionally released from custody and had not identified ongoing collateral consequences from the parole revocation.
2. Whether petitioner should be ordered to show cause why the petition should not be dismissed without prejudice for lack of a live case or controversy.

HOLDINGS

1. An unconditional release from custody moots a challenge to an allegedly erroneous parole revocation unless the petitioner demonstrates continuing collateral consequences or another possibility of effective relief.
2. When no possibility remains that the court can grant effective relief, the claim is moot and must be dismissed for lack of subject-matter jurisdiction.

KEY QUOTATIONS

“A case becomes moot when it no longer satisfies the case-or-controversy requirement of Article III, section 2, of the Constitution.”

“In the parole revocation context, the Supreme Court has held that without proof of ongoing collateral consequences from that revocation, an unconditional release from custody moots a defendant’s challenge to his allegedly erroneous revocation.”

“The Court therefore ORDERS Petitioner to show cause why this case should not be dismissed without prejudice because his claims are moot.”

FACTUAL BACKGROUND

Seaholm filed a habeas petition seeking reversal of the revocation of his parole for alleged due process violations. The action was stayed pending exhaustion of state-court remedies, and Seaholm submitted status reports concerning exhaustion. In his most recent report, he stated that there had been no movement on the writ and informed the court that he was no longer in custody.

PROCEDURAL HISTORY

Petitioner filed a 28 U.S.C. § 2254 habeas petition seeking reversal of his parole revocation based on alleged due process violations. The action was stayed while he exhausted state-court remedies, and he filed periodic status reports. After reporting that he was no longer in custody, the court issued an order to show cause regarding mootness and warned that failure to respond could lead to a recommendation of dismissal for failure to prosecute.

DISPOSITION

other

CASES CITED

- U.S. v. Verdin, 243 F.3d 1174, 1177 (9th Cir. 2001)
- Ruvalcaba v. City of Los Angeles, 167 F.3d 514, 521 (9th Cir. 1999)
- Calderon v. Moore, 518 U.S. 149, 150 (1996)
- United States v. King, 891 F.3d 868, 869 (9th Cir. 2018)
- Spencer v. Kemna, 523 U.S. 1, 8-16 (1998)

OPINION

Cameron Charles Seaholm v. California Board of Prison Hearings

PER CURIAM.

CENTRAL DISTRICT OF CALIFORNIA

CIVIL MINUTES - GENERAL

Case No. 5:24-cv-2517-JWH-MBK Date November 26, 2025 Title Cameron Charles Seaholm v. California Board of Prison Hearings Present: The Michael B. Kaufman, United States Magistrate Judge Honorable James Muñoz n/a Deputy Clerk Court Reporter / Recorder Attorneys Present for Petitioner: Attorneys Present for Respondent: none none Proceedings: ORDER FOR PETITIONER TO SHOW CAUSE WHY HIS

PETITION IS NOT MOOT

This habeas action is currently stayed pending Petitioner Charles Seaholm’s exhaustion of state court remedies. Dkt. 20. Petitioner has been complying with the Court’s orders to file status reports regarding the status of the exhaustion of his state court remedies. See Dkts. 22-26. Most recently, on November 7, 2025, Petitioner filed a status report and a Notice of Change of Address informing the Court that “there has been no movement on the writ to the CSC.” Dkt. 26. Petitioner also informed the Court that he is no longer in custody. Id. Because he has been released from custody, Petitioner is ordered to show cause (meaning explain in writing) why his petition is not moot. “A case becomes moot when it no longer satisfies the case-or-controversy requirement of Article III, section 2, of the Constitution.” U.S. v. Verdin, 243 F.3d 1174, 1177 (9th Cir. 2001) (citation omitted). To maintain a viable claim, a litigant must continue to have a personal stake in the outcome of the suit throughout “all stages of federal judicial proceedings.” Id. If there is no longer a possibility that a party can obtain relief for his claim, that claim is moot and must be dismissed for lack of jurisdiction. See Ruvalcaba v. City of Los Angeles, 167 F.3d 514, 521 (9th Cir. 1999). “[W]hen, by virtue of an intervening event, a court [] cannot ‘grant any effectual relief whatever’ in favor of the [petitioner],” the proceeding should be dismissed as moot. Calderon v. Moore, 518 U.S. 149, 150 (1996) (citation omitted). In his habeas petition, Petitioner requests “reversal of revocation of his parole” to remedy the alleged due process violations in his

revocation proceedings. Dkt. 1 at 6.

CENTRAL DISTRICT OF CALIFORNIA

CIVIL MINUTES - GENERAL

Case No. 5:24-cv-2517-JWH-MBK Date November 26, 2025 Title Cameron Charles Seaholm v. California Board of Prison Hearings However, because Petitioner is no longer in custody, it does not appear that there is any additional relief that this Court can order. “In the parole revocation context, the Supreme Court has held that without proof of ongoing collateral consequences from that revocation, an unconditional release from custody moots a defendant’s challenge to his allegedly erroneous revocation.” *United States v. King*, 891 F.3d 868, 869 (9th Cir. 2018) (citing *Spencer v. Kemna*, 523 U.S. 1, 8-16 (1998)). “Subsistence of the suit requires, therefore, that continuing ‘collateral consequences’ of the parole revocation be” shown. *Spencer*, 523 U.S. at 8. The Court therefore ORDERS Petitioner to show cause why this case should not be dismissed without prejudice because his claims are moot. Petitioner’s response is due on or before December 26, 2025. Petitioner is advised that the failure to timely respond to this order to show cause may result in the Court’s recommending that this case be dismissed under Federal Rule of Civil Procedure 41 for failure to prosecute. IT IS SO ORDERED.