

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
TEXAS, TEXARKANA DIVISION

Tyran Patton v. Warden, FCI-Texarkana

Patton · No. 5:23cv127-JRG-JBB · Decided March 20, 2026

SUMMARY

The United States District Court for the Eastern District of Texas adopted a magistrate judge’s Report and Recommendation in a 28 U.S.C. § 2241 habeas petition challenging the Bureau of Prisons’ refusal to transfer the petitioner to home confinement under the CARES Act. The court dismissed the petition as moot, denied any pending motions, and entered the order on March 20, 2026.

CASE DETAILS

COURT	United States District Court for the Eastern District of Texas, Texarkana Division
WRITING FOR THE COURT	Rodney Gilstrap
JURISDICTION	United States District Court for the Eastern District of Texas, Texarkana Division
DECIDED	March 20, 2026
DOCKET	5:23cv127-JRG-JBB
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging the Bureau of Prisons' refusal to transfer Petitioner to home confinement under the CARES Act; the district court adopted the magistrate judge's report and recommendation and dismissed the petition as moot.
STANDARD OF REVIEW	When no objections are filed to a magistrate judge's report and recommendation, the district court reviews for clear error, abuse of discretion, and whether the recommendation is contrary to law; unobjected-to factual findings and legal conclusions are generally not subject to de novo review and are reviewable on appeal only for plain error.
PRECEDENTIAL VALUE	Unpublished district court order; precedential status not stated
PARTIES	Tyran Patton v. Warden, FCI-Texarkana

TOPICS

federal habeas corpus

post-conviction relief

remedies

administrative law

civil procedure

PRACTICE AREAS

Federal habeas corpus

Post-conviction relief

Administrative law

Remedies

QUESTIONS PRESENTED

1. Whether the district court should adopt the magistrate judge's Report and Recommendation when no objections were filed.
2. Whether the § 2241 petition challenging refusal of transfer to home confinement should be dismissed as moot because the court lacked power to grant the requested relief.

HOLDINGS

1. Because Petitioner filed no objections, he was not entitled to de novo review by the district judge of the magistrate judge's proposed findings, conclusions, and recommendations, and, absent plain error, was barred from appellate review of the unobjected-to factual findings and legal conclusions accepted by the district court.
2. The petition for a writ of habeas corpus was dismissed as moot because the court lacked the power to grant the requested transfer to home confinement.

KEY QUOTATIONS

“where a letter is properly placed in the United States mail, a presumption exists that the letter reached its destination in the usual time and was actually received by the person to whom it was addressed.”

“clearly erroneous, abuse of discretion and contrary to law”

FACTUAL BACKGROUND

Tyran Patton, a federal prisoner, filed a § 2241 petition challenging the Bureau of Prisons' refusal to transfer him to home confinement under the CARES Act. The magistrate judge concluded that the petition should be dismissed as moot because the court lacked power to grant the requested relief. The district court adopted that recommendation after receiving no objections.

PROCEDURAL HISTORY

The petition was referred to United States Magistrate Judge J. Boone Baxter under 28 U.S.C. § 636. The magistrate judge issued a February 19, 2026 Report and Recommendation recommending dismissal as moot because the court lacked power to grant the requested relief. No objections were filed, and the district court adopted the Report and Recommendation, dismissed the petition as moot, and denied all pending motions.

DISPOSITION

dismissed

CASES CITED

- *Faciane v. Sun Life Assurance Company of Canada*, 931 F.3d 412, 420-21 & n.9 (5th Cir. 2019)
- *Duarte v. City of Lewisville, Texas*, 858 F.3d 348, 352 (5th Cir. 2017)
- *Arriaga v. Laxminarayan*, Case No. 4:21-CV-00203-RAS, 2021 WL 3287683, at *1 (E.D. Tex. July 31, 2021)
- *United States v. Wilson*, 864 F.2d 1219, 1221 (5th Cir. 1989)

OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION TYRAN PATTON § v. § CIVIL ACTION NO. 5:23cv127-JRG-JBB
WARDEN, FCI-TEXARKANA § ORDER ADOPTING REPORT AND RECOMMENDATION
OF THE UNITED STATES MAGISTRATE JUDGE Before the Court is Petitioner's petition for the writ of habeas corpus under 28 U.S.C. § 2241 challenging the refusal by the Bureau of Prisons to transfer him to home confinement under the CARES Act.

Docket No. 1. The case was referred to United States Magistrate Judge J. Boone Baxter in accordance with 28 U.S.C. § 636. On February 19, 2026, the Magistrate Judge issued a Report and Recommendation, recommending the above petition for the writ of habeas corpus be dismissed as moot in that the Court lacks the power to grant the requested relief. Docket No. 34.

A copy of the Report and Recommendation was sent to Petitioner at his last known address, return receipt requested, but no acknowledgement has been received. The Fifth Circuit has explained that where a letter is properly placed in the United States mail, a presumption exists that the letter reached its destination in the usual time and was actually received by the person to whom it was addressed.

Faciane v. Sun Life Assurance Company of Canada, 931 F.3d 412, 420-21 and n.9 (5th Cir. 2019). As of this date, no objections have been filed to the February 19, 2026 Report and Recommendation. Because no objections have been received, Petitioner is barred from de novo review by the District Judge of the Magistrate Judge's proposed findings, conclusions and recommendations and, except upon grounds of plain error, from appellate review of the unobjected-to factual findings and legal conclusions accepted and adopted by the District Court.

See *Duarte v. City of Lewisville, Texas*, 858 F.3d 348, 352 (Sth Cir. 2017); *Arriaga* □□□ *Laxminarayan*, Case No. 4:21-CV-00203- RAS, 2021 WL 3287683, at *1 (E.D. Tex. July 31, 2021). The Court has reviewed the pleadings in this case and the Report and Recommendation of the Magistrate Judge. Upon such review, the Court has determined the Report of the Magistrate Judge is correct.

See *United States v. Wilson*, 864 F.2d 1219, 1221 (5th Cir. 1989) (where no objections to a Magistrate Judge's Report are filed, the standard of review is "clearly erroneous, abuse of discretion and contrary to law").

Accordingly, it is ORDERED that the Report and Recommendation of the Magistrate Judge (Docket No. 34) is ADOPTED as the opinion of the District Court. It is further ORDERED the above petition for the writ of habeas corpus is DISMISSED as moot. It is further ORDERED that any and all motions which may be pending in this action are hereby DENIED. So ORDERED and SIGNED this 20th day of March, 2026.

RODNEY GILSTRAP \ UNITED STATES DISTRICT JUDGE