

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PRECEDENTIAL VALUE	Unpublished district court order; precedential status not stated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)

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