

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA, SOUTH BEND DIVISION

Steinert v. Warden

Steinert · No. 3:26-CV-347-CCB-SJF · Decided May 14, 2026

SUMMARY

The United States District Court for the Northern District of Indiana dismissed Christopher S. Steinert’s Section 2254 habeas petition without prejudice because his claims had not been exhausted through Indiana state-court proceedings. The court denied a certificate of appealability and directed the clerk to close the case.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana, South Bend Division
WRITING FOR THE COURT	Cristal C. Brisco
JURISDICTION	United States District Court for the Northern District of Indiana, South Bend Division
DECIDED	May 14, 2026
DOCKET	3:26-CV-347-CCB-SJF
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner sought federal habeas relief under 28 U.S.C. § 2254 from an Indiana conviction and ten-year sentence. The district court dismissed the petition without prejudice under Habeas Corpus Rule 4 because the claims had not been exhausted in state court, denied a certificate of appealability, and closed the case.
STANDARD OF REVIEW	Under Rule 4 governing § 2254 cases, the court must dismiss a petition if it plainly appears from the petition and attached exhibits that the petitioner is not entitled to relief. A procedural dismissal requires consideration of whether a stay is appropriate, and a certificate of appealability requires the petitioner to show that reasonable jurists could debate both the procedural ruling and the validity of the constitutional claim.
PRECEDENTIAL VALUE	unpublished

PARTIES

Christopher S. Steinert v. Warden

TOPICS

federal habeas corpus

state post-conviction relief

statute of limitations

appellate procedure

PRACTICE AREAS

federal habeas corpus

post-conviction relief

appellate procedure

constitutional law

QUESTIONS PRESENTED

1. Whether the federal habeas petition should be dismissed because Steinert had not exhausted his claims in Indiana state court.
2. Whether the court should stay rather than dismiss the unexhausted petition because dismissal might affect future federal habeas review.
3. Whether Steinert was entitled to a certificate of appealability from the procedural dismissal.

HOLDINGS

1. A federal habeas petition must be dismissed without prejudice when the petitioner's claims have not been fairly presented through one complete round of state-court review, including discretionary review, and the record shows that the claims remain unexhausted.
2. A stay was not warranted because Steinert had sufficient time to complete state-court review and file a new federal habeas petition before expiration of the applicable limitations period.
3. A certificate of appealability was denied because reasonable jurists would not debate the correctness of the procedural dismissal or whether the petition stated a valid constitutional claim.

KEY QUOTATIONS

“Fair presentment in turn requires the petitioner to assert his federal claim through one complete round of state-court review, either on direct appeal of his conviction or in post-conviction proceedings.”

“Until exhaustion has occurred (which has not happened here), federal habeas relief is not available.”

FACTUAL BACKGROUND

Steinert was convicted in Fulton Circuit Court and sentenced to ten years. The Indiana Court of Appeals affirmed his conviction, but he did not seek discretionary transfer to the Indiana Supreme Court. His state post-conviction petition was still pending when he filed this federal habeas petition, and none of his three federal grounds had been presented through a complete round of state-court review.

PROCEDURAL HISTORY

The Fulton Circuit Court convicted Steinert and imposed a ten-year sentence. The Indiana Court of Appeals affirmed on June 24, 2025; Steinert did not seek transfer to the Indiana Supreme Court. He filed a state post-

conviction petition on July 10, 2025, which remained unresolved when he filed this federal habeas petition. The district court dismissed the federal petition without prejudice for failure to exhaust state remedies and denied a certificate of appealability.

DISPOSITION

dismissed

CASES CITED

- Lewis v. Sternes, 390 F.3d 1019, 1025-26 (7th Cir. 2004)
- Dolis v. Chambers, 454 F.3d 721, 725 (7th Cir. 2006)
- Slack v. McDaniel, 529 U.S. 473, 484 (2000)
- Steinert v. State, 24A-CR-3065 (Ind. filed Dec. 18, 2024)