

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
ILLINOIS, SPRINGFIELD DIVISION

James Owens v. Latoya Hughes, et al.

Owens v. Hughes · No. 3:25-cv-03161-MMM · Decided February 2, 2026

SUMMARY

The United States District Court for the Central District of Illinois dismissed James Owens’s 42 U.S.C. § 1983 action challenging the terms of his mandatory supervised release. The court held that the claims were barred by Heck v. Humphrey and must instead be pursued through state-court collateral review and federal habeas corpus. The court also denied Owens’s motions for appointment of counsel and an expedited hearing, and denied his motions for status as moot.

CASE DETAILS

COURT	United States District Court for the Central District of Illinois, Springfield Division
WRITING FOR THE COURT	Michael M. Mihm
JURISDICTION	United States District Court for the Central District of Illinois, Springfield Division
DECIDED	February 2, 2026
DOCKET	3:25-cv-03161-MMM
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se incarcerated plaintiff brought a 42 U.S.C. § 1983 action challenging the constitutionality of the terms of his Illinois mandatory supervised release. The district court conducted merit review under 28 U.S.C. § 1915A, denied requests for appointed counsel and an expedited hearing, denied status motions as moot, and dismissed the action with prejudice.
STANDARD OF REVIEW	At merit review under 28 U.S.C. § 1915A, the court accepted factual allegations as true and construed them liberally in plaintiff’s favor, while requiring factual allegations sufficient to state a plausible claim. Appointment of counsel under 28 U.S.C. § 1915(e)(1) was committed to the district court’s discretion under the two-step Pruitt inquiry.
PRECEDENTIAL VALUE	unpublished

PARTIES

James Owens v. Latoya Hughes, Illinois Prisoner Review Board, Chair and members of the Illinois Prisoner Review Board, Jason Garnett, Dion Dixon, John Does, Alyssa Williams

TOPICS

section 1983 prisoners rights federal habeas corpus civil procedure

PRACTICE AREAS

civil rights prisoner litigation federal habeas corpus civil procedure appointment of counsel

QUESTIONS PRESENTED

1. Whether Owens's § 1983 claims challenging the terms of his mandatory supervised release were barred by *Heck v. Humphrey* because success would necessarily imply the invalidity of his sentence.
2. Whether Owens was entitled to appointment of pro bono counsel under 28 U.S.C. § 1915(e)(1).
3. Whether Owens was entitled to an expedited hearing.
4. Whether his motions for case status were moot.

HOLDINGS

1. A prisoner may not obtain relief under § 1983 when success would necessarily imply the invalidity of the conviction or sentence, unless the conviction or sentence has already been reversed, expunged, invalidated, or called into question through federal habeas relief. The Heck bar applies to conditions or terms of mandatory supervised release.
2. Appointment of pro bono counsel is discretionary and requires consideration of whether the indigent plaintiff made a reasonable attempt to obtain counsel and, if so, whether the difficulty of the case exceeds the plaintiff's demonstrated ability to litigate it.
3. The motion for an expedited hearing was denied.
4. The motions for status were denied as moot.

KEY QUOTATIONS

“Heck prohibits a prisoner from obtaining relief in a § 1983 suit where a judgment in [his] favor “would necessarily imply the invalidity of his conviction or sentence.”” (512 U.S. at 487)

“district judges should engage in a two-step inquiry when faced with a request for pro bono counsel under § 1915(e)(1), asking first “(1) has the indigent plaintiff made a reasonable attempt to obtain counsel or been effectively precluded from doing so; and if so, (2) given the difficulty of the case, does the plaintiff appear competent to litigate it himself?”” (503 F.3d at 654)

FACTUAL BACKGROUND

Owens is incarcerated in Illinois and is nearing the end of a thirty-year sentence imposed after he pleaded guilty to sexually assaulting his son's friend. He sought to challenge various proposed terms of his mandatory supervised release, naming Illinois prison and parole officials and other defendants. He had not shown that the challenged terms had been invalidated through a complete state-court collateral review followed by federal habeas proceedings.

PROCEDURAL HISTORY

Owens filed a civil-rights complaint concerning the terms of his mandatory supervised release and moved for appointment of counsel, an expedited hearing, and case-status information. The district court concluded that the claims were barred by *Heck v. Humphrey* because success would necessarily imply the invalidity of the sentence and that the sentence had not been invalidated through state or federal habeas proceedings. The court denied appointment of counsel and expedited relief, denied the status motions as moot, dismissed the action with prejudice, and directed judgment for defendants.

DISPOSITION

dismissed

CASES CITED

- *Heck v. Humphrey*, 512 U.S. 477 (1994)
- *Turley v. Rednour*, 729 F.3d 645 (7th Cir. 2013)
- *Alexander v. United States*, 721 F.3d 418 (7th Cir. 2013)
- *Williams v. Wisconsin*, 336 F.3d 576 (7th Cir. 2003)
- *Ortega v. Ford*, No. 23-1784, 2024 WL 1634072 (7th Cir. Apr. 16, 2024)
- *Pruitt v. Mote*, 503 F.3d 647 (7th Cir. 2007) (en banc)
- *Mallard v. U.S. District Court for the Southern District of Iowa*, 490 U.S. 296 (1989)
- *Olson v. Morgan*, 750 F.3d 708 (7th Cir. 2014)
- *Watts v. Kidman*, 42 F.4th 755 (7th Cir. 2022)
- *Jones v. Anderson*, 116 F.4th 669 (7th Cir. 2024)
- *Owens v. Wexford Health Sources, et al.*, No. 22-2882, 2024 WL 5242367 (7th Cir. Dec. 30, 2024)
- *Thomas James v. Lorenzo Eli, James v. Eli*, 889 F.3d 320 (7th Cir. 2018)