

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
LOUISIANA, LAKE CHARLES DIVISION

Charles Thompson v. Judge James D. Cain, Jr. and FCI Oakdale

No. 6:25-cv-00649 (W.D. La. Dec. 1, 2025) · No. 6:25-cv-00649 · Decided December 1, 2025

SUMMARY

This Report and Recommendation addresses Charles Thompson’s 28 U.S.C. § 2241 petition seeking transfer from FCI Oakdale to prerelease custody based on earned time credits and administrative eligibility. Because Thompson had been released to a residential reentry center, the magistrate judge recommended that the petition and related Administrative Procedure Act claims be denied and dismissed as moot for lack of an Article III case or controversy.

CASE DETAILS

COURT	United States District Court for the Western District of Louisiana, Lake Charles Division
WRITING FOR THE COURT	Thomas P. LeBlanc
JURISDICTION	United States District Court for the Western District of Louisiana, Lake Charles Division
DECIDED	December 1, 2025
DOCKET	6:25-cv-00649
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner's 28 U.S.C. § 2241 habeas petition and related Administrative Procedure Act claims were presented to a federal magistrate judge in a report and recommendation.
STANDARD OF REVIEW	Jurisdictional mootness is assessed by whether the court can still grant the relief requested; absent an actual controversy, the court lacks Article III jurisdiction and must dismiss.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Charles Thompson v. Judge James D. Cain, Jr., FCI Oakdale

TOPICS

- federal habeas corpus
- subject matter jurisdiction
- administrative procedure act
- judicial review of agency action
- civil procedure

PRACTICE AREAS

Federal habeas corpus

Administrative law

Federal civil procedure

Constitutional law

QUESTIONS PRESENTED

1. Whether Thompson's § 2241 habeas petition became moot after he was released to a Residential Reentry Center.
2. Whether the related APA claims for declaratory and injunctive relief were also moot because they sought the same transfer relief.
3. Whether the court lacked jurisdiction because no live Article III case or controversy remained.

HOLDINGS

1. The petition was moot because Thompson had already been released to a Residential Reentry Center, so the court could no longer grant the requested transfer relief.
2. Because the petition presented no live Article III case or controversy, the court lacked constitutional jurisdiction and the petition had to be dismissed.
3. The APA claims were subject to the same disposition as the habeas claim because they sought the same declaratory and injunctive transfer relief.

KEY QUOTATIONS

“Accordingly, IT IS RECOMMENDED that the instant Petition for Writ of Habeas Corpus [Doc. 1] be DENIED and DISMISSED as it presents no case or controversy and, thus, this Court lacks jurisdiction.” (at 1)

“A moot case “presents no Article III case or controversy, and a court has no constitutional jurisdiction to resolve the issue it presents.”” (at 2)

FACTUAL BACKGROUND

Charles Thompson, formerly confined at the Federal Correctional Institution in Oakdale, Louisiana, alleged that he had earned sufficient time credits and was administratively eligible for prerelease custody but remained unlawfully confined. He sought an immediate transfer to either a Residential Reentry Center or home confinement. During the litigation, he was released to a Residential Reentry Center, making the requested transfer relief unavailable.

PROCEDURAL HISTORY

Charles Thompson filed a § 2241 petition seeking immediate transfer from federal incarceration to prerelease custody, along with APA claims seeking declaratory and injunctive relief concerning the same transfer. While the action was pending, Thompson was released to a Residential Reentry Center. The magistrate judge therefore recommended denial and dismissal because the requested relief could no longer be granted, rendering the matter moot and depriving the court of jurisdiction.

DISPOSITION

dismissed

CASES CITED

- Salgado v. Federal Bureau of Prisons, 220 F. App'x 256, 257 (5th Cir. 2007)
- Brown v. Resor, 407 F.2d 281, 283 (5th Cir. 1969)
- Bailey v. Southerland, 821 F.2d 277, 278 (5th Cir. 1987)
- Adair v. Dretke, 150 F. App'x 329, 331 (5th Cir. 2005)
- Douglass v. United Services Automobile Association, 79 F.3d 1415 (5th Cir. 1996)

OPINION

Thompson

PER CURIAM.

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA

LAKE CHARLES DIVISION

CHARLES THOMPSON DOCKET NO. 6:25-cv-00649

SECTION P

VERSUS JUDGE JAMES D. CAIN, JR.

FCI OAKDALE MAGISTRATE JUDGE LEBLANC

REPORT AND RECOMMENDATION

Before the Court is a petition for writ of habeas corpus (28 U.S.C. § 2241) filed by pro se Petitioner Charles Thompson. At the time of filing, Petitioner was an inmate at the Federal Correctional Institute in Oakdale, Louisiana (FCIO). Petitioner filed the instant action asserting that even though he had earned sufficient time credits and been found administratively eligible for prerelease custody, he remained unlawfully confined. Doc. 1-2, p. 1. He asked this Court to order his immediate transfer to prerelease custody to either a Residential Reentry Center or home confinement. *Id.* at p. 17. 1 Thompson has since been released to a Residential Reentry Center. See Inmate Locator- BOP, available at <https://www.bop.gov/inmateloc/> (last visited December 1, 2025). Accordingly, IT IS RECOMMENDED that the instant Petition for Writ of Habeas Corpus [Doc. 1] be DENIED and DISMISSED as it presents no case or controversy and, thus, this Court lacks jurisdiction.² 1 The petition also asserts claims under the Administrative Procedures Act, 5 U.S.C. § 706, by which Petitioner seeks “declaratory relief . . . and injunctive relief . . . compelling the Bureau to effectuate the transfer” of Petitioner to prerelease custody. Doc. 1-2, p. 13. As the relief sought under the APA is the same as that sought by the writ of habeas corpus, the APA claims must suffer the same fate as the writ of habeas corpus. 2 When, as here, “the court cannot grant the relief requested by the moving party,” then the matter is moot. *Salgado v. Fed. Bureau of*

Prisons, 220 F. App'x 256, 257 (5th Cir. 2007) (citing *Brown v. Resor*, 407 F.2d 281, 283 (5th Cir. 1969) and *Bailey v. Southerland*, 821 F.2d 277, 278 (5th Cir. 1987)). Under the provisions of 28 U.S.C. Section 636(b)(1)(C) and Rule 72(b), parties aggrieved by this recommendation have fourteen (14) business days from service of this report and recommendation to file specific, written objections with the Clerk of Court. A party may respond to another party's objections within fourteen (14) days after being served with a copy of any objections or response to the district judge at the time of filing. Failure to file written objections to the proposed factual findings and/or the proposed legal conclusions reflected in this Report and Recommendation within fourteen (14) days following the date of its service, or within the time frame authorized by Fed.R.Civ.P. 6(b), shall bar an aggrieved party from attacking either the factual findings or the legal conclusions accepted by the District Court, except upon grounds of plain error. See, *Douglass v. United Services Automobile Association*, 79 F.3d 1415 (5th Cir. 1996). **THUS DONE AND SIGNED** in chambers this 1st day of December, 2025.

T Ho} AS P. LEBLANC

UNITED STATES MAGISTRATE JUDGE

1969) and *Bailey v. Southerland*, 821 F.2d 277, 278 (5th Cir. 1987)). The issue of whether a case is moot presents a jurisdictional matter because it implicates the Article III requirement that an actual controversy exist at all stages of federal court proceedings. *Bailey*, 821 F.2d at 278. A moot case "presents no Article III case or controversy, and a court has no constitutional jurisdiction to resolve the issue it presents." *Adair v. Dretke*, 150 F. App'x. 329, 331 (5th Cir. 2005) (citation omitted). Absent jurisdiction, we must dismiss. -2-