

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)

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