

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE, NASHVILLE DIVISION

Thomas J. Hooghe v. Jerry Scott, et al.

No. 3:25-cv-01207 · No. No. 3:25-cv-01207 · Decided April 17, 2026

SUMMARY

The court grants Thomas J. Hooghe’s application to proceed in forma pauperis and assesses the applicable prisoner filing fee under 28 U.S.C. § 1915. On initial review under the Prison Litigation Reform Act, the court allows his First Amendment damages claim concerning a Sumner County Jail policy restricting access to outside media to proceed against the defendants, while dismissing his request for injunctive relief as moot because he is no longer in that custody.

CASE DETAILS

COURT	United States District Court for the Middle District of Tennessee, Nashville Division
WRITING FOR THE COURT	William L. Campbell Jr.
JURISDICTION	United States District Court for the Middle District of Tennessee, Nashville Division
DECIDED	April 17, 2026
DOCKET	No. 3:25-cv-01207
DISPOSITION	other
PROCEDURAL POSTURE	Pro se former inmate filed a 42 U.S.C. § 1983 complaint and an application to proceed in forma pauperis. The district court conducted initial screening under the Prison Litigation Reform Act and allowed the damages claim to proceed while dismissing the request for injunctive relief as moot.
STANDARD OF REVIEW	At PLRA and IFP screening, the court determines whether the complaint is frivolous, malicious, fails to state a claim, or seeks monetary relief from an immune defendant. Failure to state a claim is assessed under the Rule 12(b)(6) plausibility standard, accepting well-pleaded factual allegations and reasonable inferences as true, construing a pro se complaint liberally, and rejecting legal conclusions and unwarranted factual inferences.

PRECEDENTIAL VALUE	unpublished district court memorandum opinion and order; persuasive value only
PARTIES	Thomas J. Hooghe v. Jerry Scott, Eric Craddock

TOPICS

first amendment prisoners rights section 1983 injunctions civil procedure

PRACTICE AREAS

civil rights prisoner litigation constitutional law federal civil procedure

QUESTIONS PRESENTED

1. Whether Hooghe qualified to proceed in forma pauperis under 28 U.S.C. § 1915.
2. Whether the complaint plausibly alleged a First Amendment claim under 42 U.S.C. § 1983 based on a jail policy conditioning access to reading materials and other outside media on an inmate's ability to pay for digital content.
3. Whether Hooghe's request for injunctive relief was moot because he was no longer confined at the Sumner County Jail.
4. Whether the case should proceed to service against the individual defendants on the damages claim.

HOLDINGS

1. The plaintiff qualified to proceed in forma pauperis because he submitted the required financial affidavit and inmate trust-account certification, and those filings showed that he could not afford to prepay the filing fee.
2. The complaint plausibly alleged that the defendants implemented a jail policy making access to reading materials and other outside media contingent on an inmate's ability to pay for digital content, and the damages claim therefore survived initial screening.
3. The request for injunctive relief was moot because the plaintiff was no longer confined at the Sumner County Jail and therefore was no longer subject to the challenged policy.

KEY QUOTATIONS

“A ban on all media in jail is permissible only if it is ‘reasonably related to legitimate penological interests’ and ‘not an exaggerated response to such objectives.’” (II.B. ANALYSIS)

“On such a reading, the Complaint, though short on factual allegations, is sufficient to assert a plausible claim that Defendants implemented a policy at the Sumner County Jail making access to reading material and other “outside media” contingent upon the inmates’ ability to pay for digital content, in violation of Plaintiff’s First Amendment rights.” (II.B. ANALYSIS)

FACTUAL BACKGROUND

While confined at the Sumner County Jail, Hooghe challenged a policy allegedly barring inmates from television, radio, newspapers, magazines, books, and other outside media unless the media was purchased through jail-issued computer tablets. He alleged that he filed grievances challenging the policy but received no relief. By the time of the order, his Sumner County sentence had expired and he was in Davidson County custody, so he was no longer subject to the challenged policy.

PROCEDURAL HISTORY

Hooghe filed a § 1983 complaint challenging a Sumner County Jail policy that allegedly restricted access to television, radio, newspapers, magazines, books, and other outside media unless purchased through jail-issued tablets. He submitted an IFP application and later supplemented it with the required trust-account certification. The court granted IFP status, assessed the statutory filing fee for collection in installments, screened the complaint, permitted the damages claim against Scott and Craddock to proceed, dismissed the injunctive-relief claim as moot because Hooghe was no longer housed at the jail, granted his construed service request, and referred the action for further proceedings.

DISPOSITION

other

CASES CITED

- Hill v. Lappin, 630 F.3d 468, 470–71 (6th Cir. 2010)
- Ashcroft v. Iqbal, 556 U.S. 662, 678–79 (2009)
- Carl v. Muskegon Cnty., 763 F.3d 592, 595 (6th Cir. 2014)
- Nat’l Rifle Ass’n of Am. v. Vullo, 602 U.S. 175, 181 (2024)
- Inner City Contracting, LLC v. Charter Twp. of Northville, Michigan, 87 F.4th 743, 749 (6th Cir. 2023)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Beard v. Banks, 548 U.S. 521, 528 (2006)
- Turner v. Safley, 482 U.S. 78, 87, 93 (1987)
- Simpson v. Windings, No. 23-CV-3190-NJR, 2024 WL 3595464, at *2–3 (S.D. Ill. July 30, 2024)
- King v. Fed. Bureau of Prisons, 415 F.3d 634, 638 (7th Cir. 2005)
- Stanley v. Georgia, 394 U.S. 557, 564 (1969)
- Munson v. Gaetz, 673 F.3d 630, 633 (7th Cir. 2012)
- Hancock v. Rowland, No. 1:15-CV-00055, 2015 WL 4459171, at *2 (M.D. Tenn. July 20, 2015)
- Kensu v. Haigh, 87 F.3d 172, 175 (6th Cir. 1996)
- Gray v. Farmer, No. 5:23-CV-112-KKC-MAS, 2025 WL 595142, at *1 (E.D. Ky. Feb. 24, 2025)