

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
TEXAS, DALLAS DIVISION

Tiuan J. Moore v. Dallas County Jail

Moore · No. No. 3:25-CV-2589-S-BW · Decided January 15, 2026

SUMMARY

A United States magistrate judge recommends dismissing Tiuan J. Moore’s amended 28 U.S.C. § 2241 petition without prejudice for lack of jurisdiction because his pretrial-detention challenges became moot after his state-court conviction and sentencing. The recommendation also notes that Moore must pursue available state-court remedies and comply with exhaustion requirements before seeking federal habeas relief under 28 U.S.C. § 2254.

CASE DETAILS

COURT	United States District Court for the Northern District of Texas, Dallas Division
WRITING FOR THE COURT	Brian McKay
JURISDICTION	United States District Court for the Northern District of Texas, Dallas Division
DECIDED	January 15, 2026
DOCKET	No. 3:25-CV-2589-S-BW
DISPOSITION	dismissed
PROCEDURAL POSTURE	A state pretrial detainee filed an amended petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging his pretrial detention, requesting damages, dismissal of the state charges, and release. After the petitioner was convicted and sentenced in the state case, the magistrate judge recommended dismissal without prejudice for lack of jurisdiction as moot.
STANDARD OF REVIEW	The recommendation advised that specific objections were required under 28 U.S.C. § 636(b)(1) and Federal Rule of Civil Procedure 72(b), and that unobjected-to factual findings and legal conclusions would be reviewed on appeal only for plain error if accepted or adopted by the district court.
PRECEDENTIAL VALUE	unknown

PARTIES

Tiuan J. Moore v. Dallas County Jail

TOPICS

federal habeas corpus

habeas corpus

post-conviction relief

speedy trial

bail

PRACTICE AREAS

Federal habeas corpus

Criminal procedure

Constitutional law

QUESTIONS PRESENTED

1. Whether Moore's § 2241 challenges to his pretrial detention became moot after his conviction and sentence in the state criminal case.
2. Whether the amended § 2241 petition should be dismissed without prejudice for lack of federal jurisdiction.

HOLDINGS

1. A habeas petition challenging pretrial detention and seeking release from pretrial custody becomes moot when the petitioner is subsequently convicted and sentenced in the only state case identified in the petition.

KEY QUOTATIONS

“A case becomes moot “when the issues presented are no longer ‘live’ or the parties lack a legally cognizable interest in the outcome.””

“Moore therefore is no longer a pretrial detainee on the only case identified in his petition, and his § 2241 petition is now moot.”

FACTUAL BACKGROUND

Moore was detained as a state pretrial detainee at the Dallas County Jail in Cause No. F-23-17048. His § 2241 petition challenged the length and legality of his pretrial detention, the absence of a bail-reduction hearing, and the lack of rulings on motions. While the petition was pending, a Dallas County jury convicted him on January 14, 2026, and he was sentenced to 24 years' imprisonment; he subsequently filed a notice of appeal.

PROCEDURAL HISTORY

Moore filed this § 2241 action while detained before trial in Dallas County, Texas. During the federal proceeding, a Dallas County jury convicted him and sentenced him to 24 years' imprisonment, and he filed a notice of appeal. The magistrate judge concluded that the petition's challenges to pretrial detention were moot and recommended dismissal without prejudice; the recommendation was issued subject to objections under 28 U.S.C. § 636(b)(1) and Federal Rule of Civil Procedure 72(b).

DISPOSITION

dismissed

CASES CITED

- United States Parole Commission v. Geraghty, 445 U.S. 388, 395-96 (1980)
- Powell v. McCormack, 395 U.S. 486, 496 (1969)
- Spencer v. Kemna, 523 U.S. 1, 7 (1998)
- Fassler v. United States, 858 F.2d 1016, 1017-18 (5th Cir. 1988)
- Yohey v. Collins, 985 F.2d 222, 228-29 (5th Cir. 1993)
- Douglass v. United Services Automobile Ass'n, 79 F.3d 1415, 1417 (5th Cir. 1996)

OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION TIUAN J. MOORE, § ID # 23031262, § Petitioner, § § v. § No. 3:25-CV-2589-S-BW § DALLAS COUNTY JAIL, § Respondent. § Referred to U.S. Magistrate Judge1
FINDINGS, CONCLUSIONS, AND RECOMMENDATION OF THE UNITED STATES
MAGISTRATE JUDGE Before the Court is the Amended Petition for Writ of Habeas Corpus
Under 28 U.S.C. § 2241, received on October 21, 2025.

(Dkt. No. 5.) Based on the relevant filings and applicable law, the Court should DISMISS the petition without prejudice for lack of jurisdiction as moot. I. BACKGROUND Tiuan Moore, while a state pretrial detainee at the Dallas County Jail, filed this habeas action under 28 U.S.C. § 2241 to challenge his pretrial detention in Cause No. F-23-17048, pending in the Criminal District Court No. 5 of Dallas County, Texas.

(See id. at 2-3.) He names Dallas County Jail as the respondent. (See id. at 1.) Moore's petition asserts the following grounds for relief: (1) Speedy Trial and Excessive Time Detainment; (2) No Bail Reduction Hearing No Motions Answered; and 1 By Special Order No. 3-251, this habeas case has been automatically referred for full case management.

(3) Unlawfully Detained In County Jail. (Id. at 5-6.) He seeks damages, dismissal of the state charges, and release from confinement. (See id. at 7.) On January 14, 2026, following a trial, a Dallas County jury convicted Moore in Cause No. F-23-17048 and sentenced him to 24 years of imprisonment. See State v. Moore, No. F-23-17048, Judgment of Conviction by Jury (Crim.

Dist. Ct. No. 5, Dallas Cnty., Tex. Jan. 14, 2026). Moore has filed a notice of appeal of the judgment in that case. See id., Notice of Appeal (Crim. Dist. Ct. No. 5, Dallas Cnty., Tex. Jan. 14, 2026). II. JURISDICTION "Article III of the Constitution limits... federal-court jurisdiction[] to 'Cases' and 'Controversies.'" United States Parole Comm'n v. Geraghty, 445 U.S. 388, 395 (1980).

A case becomes moot “when the issues presented are no longer ‘live’ or the parties lack a legally cognizable interest in the outcome.” *Id.* at 396 (quoting *Powell v. McCormack*, 395 U.S. 486, 496 (1969)). This case-or-controversy requirement subsists through all stages of federal judicial proceedings, trial and appellate....

The parties must continue to have a ‘personal stake in the outcome’ of the lawsuit. This means that, throughout the litigation, the plaintiff “must have suffered, or be threatened with, an actual injury traceable to the defendant and likely to be redressed by a favorable judicial decision. *Spencer v. Kemna*, 523 U.S. 1, 7 (1998) (internal citations and quotation marks omitted).

Here, Moore’s challenges to his pretrial detention were pending when he was convicted and sentenced in Cause No. F-23-17048. Moore therefore is no longer a pretrial detainee on the only case identified in his petition, and his § 2241 petition is now moot. See *Fassler v. United States*, 858 F.2d 1016, 1017-18 (Sth Cir. 1988) (holding that a petitioner’s habeas petition challenging the validity of his pretrial detention and seeking release from pretrial custody was mooted by his subsequent conviction); *Yohey v. Collins*, 985 F.2d 222, 228-29 (Sth Cir.

1993) (holding that the petitioner’s “claims for federal habeas relief for pretrial issues are mooted by [his] subsequent conviction.”). Accordingly, the Court should dismiss Moore’s pretrial § 2241 petition without prejudice for lack of jurisdiction as moot.” II. RECOMMENDATION The Court should DISMISS the Amended Petition for Writ of Habeas Corpus Under 28 U.S.C. § 2241, received on October 21, 2025 (Dkt.

No. 5), without prejudice for lack of jurisdiction as moot. SO RECOMMENDED on January 15, 2026. wn BRIAM McKAY UNITED STATES MAGISTRATE JUDGE * The Court further notes that because Moore is now detained pursuant to a state court judgment, other state court remedies for pursuing his claims are available, and comity requires that he exhaust those remedies before seeking relief in federal court.

See 28 U.S.C. § 2254(b). INSTRUCTIONS FOR SERVICE AND NOTICE OF RIGHT TO APPEAL/OBJECT A copy of this report and recommendation will be served on all parties in the manner provided by law. Any party who objects to any part of this report and recommendation must file specific written objections within 14 days after being served with a copy. See 28 U.S.C. § 636(b)(1); Fed.

R. Civ. P. 72(b). To be specific, an objection must identify the finding or recommendation to which objection is made, state the basis for the objection, and indicate the place in the magistrate judge’s report and recommendation where the disputed determination is found. An objection that merely incorporates by reference or refers to the briefing before the magistrate judge is not specific.

Failure to file specific written objections will bar the aggrieved party from appealing the factual findings and legal conclusions of the magistrate judge that are accepted or adopted by the district

court, except upon grounds of plain error. See *Douglass v. United Services Automobile Ass'n*, 79 F.3d 1415, 1417 (5th Cir. 1996), modified by statute on other grounds, 28 U.S.C. § 636(b)(1) (extending the time to file objections to 14 days).

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