

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
ALABAMA, NORTHERN DIVISION

Rashad C. Lee v. Cynthia W. Stuart, et al.

Lee v. Stuart · No. 2:25-cv-531-MHT-CWB · Decided February 6, 2026

SUMMARY

A magistrate judge recommends denying as moot a state prisoner’s request for a preliminary injunction seeking release from restrictive housing at Kilby Correctional Facility. The recommendation concludes that the plaintiff’s transfer to another facility eliminated the threat of future harm and mooted his request for prospective injunctive relief.

CASE DETAILS

COURT	United States District Court for the Middle District of Alabama, Northern Division
WRITING FOR THE COURT	Chad W. Bryan
JURISDICTION	United States District Court for the Middle District of Alabama, Northern Division
DECIDED	February 6, 2026
DOCKET	2:25-cv-531-MHT-CWB
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff brought a 42 U.S.C. § 1983 action and requested a preliminary injunction requiring his release from restrictive housing at Kilby Correctional Facility. After Plaintiff was transferred to another facility, the magistrate judge recommended denying the injunction request as moot.
STANDARD OF REVIEW	A preliminary injunction is reviewed for abuse of discretion; the movant must clearly establish a substantial likelihood of success on the merits, irreparable injury absent relief, lack of substantial harm to the opposing party, and consistency with the public interest.
PRECEDENTIAL VALUE	nonprecedential magistrate judge recommendation
PARTIES	Rashad C. Lee v. Cynthia W. Stuart, et al.

TOPICS

injunctions

section 1983

prisoners rights

equitable relief

civil procedure

PRACTICE AREAS

civil rights

prisoner litigation

federal civil procedure

equitable remedies

QUESTIONS PRESENTED

1. Whether Plaintiff's request for a preliminary injunction became moot after his transfer from the facility where the alleged conduct occurred.
2. What standard governs the grant or denial of a preliminary injunction.

HOLDINGS

1. A prisoner's claim for injunctive relief concerning conditions at a particular correctional facility becomes moot upon transfer or release from that facility, absent class certification, because the plaintiff no longer faces the threatened future injury.
2. A preliminary injunction may issue only when the movant clearly establishes all four prerequisites: substantial likelihood of success on the merits, irreparable injury absent relief, no substantial harm to the opposing litigant, and consistency with the public interest.

KEY QUOTATIONS

"In a § 1983 action filed by a prisoner, a request for injunctive relief becomes moot upon transfer or release from the facility giving rise to the request." (Discussion)

"Equitable relief is a prospective remedy, intended to prevent future injuries." (Discussion)

"Accordingly, Plaintiff's request for injunctive relief is moot." (Conclusion)

FACTUAL BACKGROUND

Lee, a prisoner, alleged that after transferring to Kilby Correctional Facility he was placed in administrative segregation within the restrictive housing unit. He requested a preliminary injunction seeking immediate release from the cell or an order requiring defendants to show cause for his continued confinement there. Before the recommendation, Lee transferred to another facility, eliminating the alleged threat tied to Kilby.

PROCEDURAL HISTORY

Lee filed the action on July 17, 2025 and sought preliminary injunctive relief concerning his placement at Kilby Correctional Facility. He later filed a notice of change of address showing that he had been transferred to a different facility. The magistrate judge issued this recommendation to deny the preliminary injunction as moot, subject to objections and de novo review by the district judge.

DISPOSITION

other

REMAND INSTRUCTIONS

The recommendation states that proceedings should be referred back to the magistrate judge for further action as appropriate. The district judge must conduct de novo review of any properly challenged findings or recommendations after objections.

CASES CITED

- Palmer v. Braun, 287 F.3d 1325, 1329 (11th Cir. 2002)
- Long v. Sec'y, Dep't of Corr., 924 F.3d 1171, 1176 (11th Cir. 2019)
- Wreal, LLC v. Amazon.com, Inc., 840 F.3d 1244, 1247 (11th Cir. 2016)
- Spears v. Thigpen, 846 F.2d 1327, 1328 (11th Cir. 1988)
- Wahl v. McIver, 773 F.2d 1169, 1173 (11th Cir. 1985)
- Owens v. Centurion Med., 778 F. App'x 754, 759 (11th Cir. 2019)
- Adler v. Duval Cnty. Sch. Bd., 112 F.3d 1475, 1477 (11th Cir. 1997)
- Smith v. Allen, 502 F.3d 1255, 1267 (11th Cir. 2007)
- McKinnon v. Talladega Cnty., Ala., 745 F.2d 1360, 1363 (11th Cir. 1984)