

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
TENNESSEE, EASTERN DIVISION

Ja'Don Malone v. Warden FNU Heidle

No. 1:26-cv-01003-JDB-jay · No. No. 1:26-cv-01003-JDB-jay · Decided February 13, 2026

SUMMARY

The United States District Court for the Western District of Tennessee denied Ja'Don Malone's motion for an extension of time to submit an inmate trust account statement. The court determined that Malone's claims were civil rights claims under 42 U.S.C. § 1983 rather than habeas claims under 28 U.S.C. § 2241, directed the Clerk to mail him the appropriate civil rights complaint form, and explained the applicable filing-fee requirements.

CASE DETAILS

COURT	United States District Court for the Western District of Tennessee, Eastern Division
WRITING FOR THE COURT	J. Daniel Breen
JURISDICTION	United States District Court for the Western District of Tennessee, Eastern Division
DECIDED	February 13, 2026
DOCKET	No. 1:26-cv-01003-JDB-jay
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner filed a pro se petition labeled under 28 U.S.C. § 2241 and a motion to proceed in forma pauperis. After petitioner failed to pay the filing fee or submit a certified inmate trust account statement by the court-ordered deadline, the court dismissed the petition without prejudice under Federal Rule of Civil Procedure 41(b). The court then construed petitioner's contemporaneous letter as a motion for an extension of time.
PRECEDENTIAL VALUE	unpublished district court order; nonprecedential
PARTIES	Ja'Don Malone v. Warden FNU Heidle

TOPICS

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether petitioner's letter should be construed as a motion for an extension of time to submit an inmate trust account statement for in forma pauperis treatment.
2. Whether the asserted prison-conditions claims were properly brought under 28 U.S.C. § 2241 or instead had to be brought as civil-rights claims under 42 U.S.C. § 1983.
3. What filing-form and fee requirements petitioner had to satisfy if he wished to pursue the asserted civil-rights claims.

HOLDINGS

1. Claims challenging the conditions of a prisoner's confinement must be pursued as civil-rights claims under 42 U.S.C. § 1983 rather than as habeas claims under 28 U.S.C. § 2241 when they do not challenge the validity or duration of confinement.
2. The motion for an extension of time to submit an inmate trust account statement for in forma pauperis treatment on the petition as a habeas action was denied; to pursue the claims as civil-rights claims, petitioner had to use the proper § 1983 complaint form and either pay the applicable filing fee or move for leave to proceed in forma pauperis.

KEY QUOTATIONS

“The Motion for an extension of time to submit Petitioner’s inmate trust account to proceed in forma pauperis on the Petition as raising habeas claims (D.E. 8) is DENIED.”

“To the extent Petitioner wishes to pursue his civil rights claims in the Petition, he must (1) file his claims on the proper form, and (2) either (a) submit the appropriate filing fee or (b) move for leave to proceed in forma pauperis.”

“The Clerk of Court is DIRECTED to mail Petitioner a copy of the Civil Rights Complaint Form.”

FACTUAL BACKGROUND

Malone, a Tennessee prisoner incarcerated at the Northwest Correctional Complex, filed a pro se pleading alleging Eighth and Fourteenth Amendment violations, an extremely hostile environment, and violations of the civil rights of institutionalized persons. Although he filed the pleading under 28 U.S.C. § 2241, the court determined that the allegations challenged conditions of confinement rather than the validity or duration of his confinement. Malone did not timely pay the filing fee or submit the required certified inmate trust account statement, and later asserted that his facility had not provided the statement despite his requests.

PROCEDURAL HISTORY

On January 2, 2026, Malone filed a petition asserting Eighth and Fourteenth Amendment and prison-conditions claims, together with an in forma pauperis motion. The court ordered him either to pay the filing fee or submit a

certified six-month inmate trust account statement by February 5, 2026. When he did neither, the court dismissed the petition without prejudice on February 6, 2026, and entered judgment. Malone's letter, postmarked February 5, stated that his housing facility had not provided the requested account statement; the court construed the letter as a motion for extension of time, denied it, and directed the Clerk to mail the proper civil-rights complaint form.

DISPOSITION

other

CASES CITED

- Sims v. King, No. 3:21-cv-00916, 2022 WL 587585, at *1 (M.D. Tenn. Feb. 25, 2022)
- Muhammad v. Close, 540 U.S. 749, 750 (2004)
- Preiser v. Rodriguez, 411 U.S. 475, 498-500 (1973)
- Nelson v. Campbell, 541 U.S. 637, 643 (2004)
- McGore v. Wrigglesworth, 114 F.3d 601, 604-605 (6th Cir. 1997)
- LaFountain v. Harry, 716 F.3d 944, 951 (6th Cir. 2013)