

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA

Jonathan N. Lane v. Sheriff

Lane · No. 3:26-CV-14-GSL-JEM · Decided March 23, 2026

SUMMARY

The United States District Court for the Northern District of Indiana considers a habeas petition challenging a state conviction and probation-related proceedings. The court concludes that the petition appears to raise unexhausted challenges to the conviction and grants the petitioner an opportunity to respond before dismissal without prejudice.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana
WRITING FOR THE COURT	Gretchen S. Lund
JURISDICTION	United States District Court for the Northern District of Indiana
DECIDED	March 23, 2026
DOCKET	3:26-CV-14-GSL-JEM
DISPOSITION	other
PROCEDURAL POSTURE	A pro se prisoner filed a petition for habeas corpus under 28 U.S.C. § 2254 challenging proceedings related to his probation revocation and conviction. The district court conducted an initial Rule 4 screening and ordered the petitioner to respond regarding exhaustion before deciding whether to dismiss the case.
STANDARD OF REVIEW	Under Section 2254 Habeas Corpus Rule 4, the court must dismiss a petition when it plainly appears from the petition and attached exhibits that the petitioner is not entitled to relief. Before reaching the merits, the court must determine whether available state remedies have been exhausted.
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	Jonathan N. Lane v. Sheriff

TOPICS

- federal habeas corpus
- state post-conviction relief
- post-conviction relief
- pleadings
- criminal procedure

PRACTICE AREAS

federal habeas corpus

state post-conviction relief

criminal procedure

civil procedure

QUESTIONS PRESENTED

1. Whether Lane's claims challenge his underlying conviction rather than the revocation of his probation.
2. Whether the petition should be dismissed or otherwise screened for failure to exhaust available state-court remedies under 28 U.S.C. § 2254(b)(1)(A) and Habeas Corpus Rule 4.
3. Whether Lane should be given an opportunity to respond before the court dismisses the petition without prejudice for failure to exhaust.

HOLDINGS

1. Lane's allegations concerning probable cause, discovery, and trial counsel appear to challenge his conviction rather than the revocation of his probation.
2. A federal court must ensure that a habeas petitioner has exhausted all available state-court remedies before considering the merits of a petition under § 2254.
3. Because Lane's conviction resulted from a guilty plea, a challenge to that conviction must be brought through Indiana post-conviction procedures rather than direct appeal.

KEY QUOTATIONS

"If it plainly appears from the petition and any attached exhibits that the petitioner is not entitled to relief in the district court." (Opinion and Order)

"Postconviction procedures do not afford a petitioner with a super-appeal, and not all issues are available." (Opinion and Order)

"Consequently, it appears that the court should dismiss this case without prejudice to Lane returning to federal court once he has finished in State court." (Opinion and Order)

FACTUAL BACKGROUND

Lane is incarcerated and filed a federal habeas petition without counsel. He pleaded guilty in Indiana state court to unlawful residential entry and sought to challenge proceedings described as involving revocation of his probation. His federal claims alleged that the prosecution lacked probable cause, failed to disclose discovery, and that trial counsel refused to advocate for him. The court found that these allegations appeared directed at the underlying conviction and that Lane had not initiated state post-conviction proceedings challenging it.

PROCEDURAL HISTORY

Lane pleaded guilty to unlawful residential entry in Allen Superior Court Case No. 02D05-2501-F6-72. He filed a federal habeas petition alleging lack of probable cause, nondisclosure of discovery, and ineffective assistance of trial counsel. The district court concluded that the claims appeared to challenge the underlying conviction rather than the probation revocation and that Lane had not pursued available state post-conviction remedies. The

court granted leave to proceed in forma pauperis and ordered Lane to respond by April 23, 2026, warning that failure to respond would result in dismissal without prejudice.

DISPOSITION

other

CASES CITED

- Lewis v. Sternes, 390 F.3d 1019, 1025 (7th Cir. 2004)
- Timberlake v. State, 753 N.E.2d 591, 597-98 (Ind. 2001)
- Hall v. State, 849 N.E.2d 466, 472 (Ind. 2006)

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