

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF
MASSACHUSETTS

James Holloway v. Devens Federal Medical Center

Holloway · No. 26-10831-LTS · Decided February 18, 2026

SUMMARY

The United States District Court for the District of Massachusetts denied James Holloway's pro se petition for a writ of mandamus against Devens Federal Medical Center. The court held that the petition failed to identify a proper officer or employee respondent and did not establish a clear entitlement to mandamus relief, noting the availability of the Bureau of Prisons' Administrative Remedy Program. The action was dismissed under 28 U.S.C. § 1915A(b)(1) and the court's inherent authority, and pending motions were denied.

CASE DETAILS

COURT	United States District Court for the District of Massachusetts
WRITING FOR THE COURT	Leo T. Sorokin
JURISDICTION	United States District Court for the District of Massachusetts
DECIDED	February 18, 2026
DOCKET	26-10831-LTS
DISPOSITION	dismissed
PROCEDURAL POSTURE	A federal prisoner filed a pro se petition for a writ of mandamus under 28 U.S.C. § 1361. The district court screened the petition under the Prison Litigation Reform Act and dismissed the action for failure to state a claim.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915A, the court must dismiss a prisoner complaint against a governmental entity, officer, or employee if it is frivolous or malicious, fails to state a claim, or seeks monetary relief from an immune defendant. In applying that standard, the court accepts the truth of factual allegations and may consider documents attached to the complaint. Pro se pleadings are construed generously.
PRECEDENTIAL VALUE	nonprecedential district court memorandum and order
PARTIES	James Holloway v. Devens Federal Medical Center

TOPICS

civil procedure

administrative law

pleadings

motions to dismiss

PRACTICE AREAS

civil procedure

mandamus

prisoner litigation

administrative law

QUESTIONS PRESENTED

1. Whether Holloway established entitlement to a writ of mandamus under 28 U.S.C. § 1361.
2. Whether the petition stated a claim for mandamus relief when it named a federal medical center rather than an individual federal officer or employee.
3. Whether the action should be dismissed under 28 U.S.C. § 1915A(b)(1) and the court's inherent authority for failure to state a claim.
4. Whether amendment would be futile.

HOLDINGS

1. Holloway was not entitled to mandamus relief because he did not demonstrate a clear entitlement to the requested relief or that irreparable harm would likely occur if the writ were withheld.
2. The petition failed to establish mandamus entitlement where it named Devens Federal Medical Center rather than an officer or employee of the United States.
3. The action was dismissed under 28 U.S.C. § 1915A(b)(1) for failure to state a claim upon which relief could be granted.
4. Leave to amend was not warranted because amendment would likely be futile.

KEY QUOTATIONS

“The writ of mandamus “is one of the most potent weapons in the judicial arsenal,” but is granted only in “extraordinary situations.”” (at 3)

“The party seeking a writ of mandamus must establish “that there is a clear entitlement to the relief requested, and that irreparable harm will likely occur if the writ is withheld.”” (at 3)

“the writ will not be used as a substitute for the regular appeals process” (at 3)

FACTUAL BACKGROUND

James Holloway, a federal prisoner confined at FMC Devens, alleged that correctional officers interfered with his efforts to mail legal documents to the United States Court of Appeals for the Sixth Circuit and retaliated against him with verbal threats. He sought an order compelling federal officers to gather allegedly exculpatory evidence from the facility's electronic reporting system. The petition named Devens Federal Medical Center itself rather than an individual federal officer or employee.

PROCEDURAL HISTORY

On February 17, 2026, Holloway filed a mandamus petition alleging that correctional officers interfered with his efforts to mail legal documents and retaliated against him through verbal threats. The court screened the petition under 28 U.S.C. § 1915A, denied the petition, dismissed the action, and denied pending motions. The court also determined that amendment would likely be futile.

DISPOSITION

dismissed

CASES CITED

- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Goodyear Tire & Rubber Co. v. Haeger, 581 U.S. 101, 107 (2017)
- Link v. Wabash R.R. Co., 370 U.S. 626, 630-31 (1962)
- Mallard v. United States Dist. Ct., 490 U.S. 296, 307-308 (1989)
- Brockton Sav. Bank v. Peat, Marwick, Mitchell & Co., 771 F.2d 5, 11 n.5 (1st Cir.)
- Axcella Building Realty Trust v. Thompson, No. 23-40151-DHH, 2024 WL 474539, at n. 2 (D. Mass. Jan. 25, 2024)
- Neitzke v. Williams, 490 U.S. 319, 325 (1989)
- Haines v. Kerner, 404 U.S. 519, 520 (1972)
- Rodi v. New Eng. Sch. of Law, 389 F.3d 5, 13 (1st Cir.)
- Ramírez-De Arellano v. United States, 442 F. Supp. 3d 499, 502 (D.P.R.)
- United States v. Jicarilla Apache Nation, 564 U.S. 162, 206 n.11 (2011)
- In re Bushkin Associates, Inc., 864 F.2d 241, 245 (1st Cir.)
- In re Cargill, Inc., 66 F.3d 1256, 1260 (1st Cir.)
- Cheney v. U.S. Dist. Court for Dist. of Columbia, 542 U.S. 367, 381 (2004)
- Ex parte Fahey, 332 U.S. 258, 260 (1947)
- In re JP Morgan Chase Bank, 799 F.3d 36, 38 (1st Cir.)
- Garayalde-Rijos v. Municipality of Carolina, 747 F.3d 15, 23 (1st Cir.)

OPINION

UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS) JAMES
HOLLOWAY) Petitioner,)) v.) Civil No. 26-10831-LTS) DEVENS FEDERAL MEDICAL
CENTER,)) Respondent.)) MEMORANDUM AND ORDER February 18, 2026 SOROKIN, J.
For the reasons set forth below, the petition is denied and this action dismissed because petitioner fails to establish that he is entitled to mandamus relief.

I. Background On February 17, 2026, James Holloway, a federal prisoner now in custody at FMC Devens, filed a pro se petition for writ of mandamus pursuant to 28 U.S.C. § 1361 against

“Devens Federal Medical Center” seeking to “[c]ompel officers of the United States to perform duties.” Docket No. 1.

As best can be gleaned from the petition, Holloway complains that correctional officers both interfered with Holloway’s efforts to mail legal documents to the United States Court of Appeals for the Sixth Circuit and retaliated against Holloway through verbal threats. *Id.* Through this action, Holloway seeks to have federal officers “gather evidence from Federal Medical Center Devens on such electronic report system at such facility [including] reports sent to psychology of what is exculpatory evidence.” *Id.* at 1.

Among other things, Holloway states that “Unit Manager Mr. Patornic has decided to retaliate [by verbally threatening Holloway].” *Id.* Attached to the petition is a “witness statement.” Docket No. 1-1. II. Standard of Review Preliminary screening is mandated by the Prison Litigation Reform Act, which requires federal courts to screen prisoner complaints seeking relief against a governmental entity, officer, or employee.

28 U.S.C. § 1915A(a). The Court must dismiss a complaint or a portion thereof if the prisoner has raised claims that (1) are legally frivolous or malicious; (2) fail to state a claim on which relief can be granted; or (3) seek monetary relief from a defendant who is immune from such relief. See 28 U.S.C. § 1915A(b). When making that determination, the Court must accept the truth of the factual allegations contained in the complaint, and it may consider the documents attached to the complaint.

Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009). In addition, federal courts possess certain “‘inherent powers,’ not conferred by rule or statute, ‘to manage their own affairs so as to achieve the orderly and expeditious disposition of cases.’” *Goodyear Tire & Rubber Co. v. Haeger*, 581 U.S. 101, 107 (2017) (quoting *Link v. Wabash R.R. Co.*, 370 U.S. 626, 630-31 (1962)).

Those powers include the power to dismiss frivolous or malicious actions, regardless of the status of the filing fee. See *Mallard v. United States Dist. Ct.*, 490 U.S. 296, 307-308 (1989); *Brockton Sav. Bank. v. Peat, Marwick, Mitchell & Co.*, 771 F.2d 5, 11 n.5 (1st Cir. 1985).

As used in this context, “frivolous” does not refer to the subjective intent of a litigant. *Axcella Building Realty Trust v. Thompson*, No. 23-40151-DHH, 2024 WL 474539, at n. 2 (D. Mass. Jan. 25, 2024). “Rather, in legal parlance, a pleading is ‘frivolous’ if it ‘lacks an arguable basis either in law or in fact.’” *Id.* (quoting *Neitzke v. Williams*, 490 U.S. 319, 325 (1989)).

Because Holloway is proceeding pro se, the Court will construe his petition generously. See *Haines v. Kerner*, 404 U.S. 519, 520 (1972); *Rodi v. New Eng. Sch. of Law*, 389 F.3d 5, 13 (1st Cir. 2004). However, as set forth below, petitioner’s allegations are insufficient to state a claim for mandamus relief. III. Discussion The common-law writ of mandamus, as codified in 28 U.S.C. § 1361, provides that: [t]he district courts shall have original jurisdiction of any action in the nature

of mandamus to compel an officer or employee of the United States or any agency thereof to perform a duty owed to the plaintiff.

28 U.S.C. § 1361. The writ of mandamus “is one of the most potent weapons in the judicial arsenal,” but is granted only in “extraordinary situations.” *Ramírez-De Arellano v. United States*, 442 F.Supp.3d 499, 502 (D. Puerto Rico 2020) (citing and quoting *United States v. Jicarilla Apache Nation*, 564 U.S. 162, 206 n.11 (2011); See *In re Bushkin Associates, Inc.*, 864 F.2d 241, 245 (1st Cir.

1989)). The party seeking a writ of mandamus must establish “that there is a clear entitlement to the relief requested, and that irreparable harm will likely occur if the writ is withheld.” *In re Cargill, Inc.*, 66 F.3d 1256 at 1260 (1st Cir. 1995). Both the Supreme Court and the First Circuit Court of Appeals have held unequivocally that a mandamus action may not circumvent or serve as a substitute for an appeals process.

Cheney v. U.S. Dist. Court for Dist. of Columbia, 542 U.S. 367, 381 (2004) (“[T]he writ will not be used as a substitute for the regular appeals process[.]”) (citing *Ex parte Fahey*, 332 U.S. 258, 260 (1947)); *In re JP Morgan Chase Bank*, 799 F.3d 36, 38 (1st Cir. 2015).

Here, the petition does not name an officer or employee as respondent. Rather, the medical center is identified as the respondent. In addition, Holloway has not demonstrated a clear entitlement to relief. The Bureau of Prisons has an established "Administrative Remedy Program" through which inmates "may seek formal review of an issue which relates to any aspect of their confinement" except issues specifically exempted elsewhere, which are not relevant here.

See 28 C.F.R. § 542.10, § 542.12. The program includes several levels, including two avenues of appeal. See 28 C.F.R. §§ 542.13-542.15. In light of the nature of the claims, the Court finds that amendment would likely be futile. *Garayalde-Rijos v. Municipality of Carolina*, 747 F.3d 15, 23 (1st Cir. 2014) (explaining that sua sponte dismissal is appropriate only when it is crystal clear that the plaintiff cannot prevail and that amending the complaint would be futile).

Accordingly, and pursuant to 28 U.S.C. § 1915A(b), the action will be dismissed for failure to state a claim upon which relief can be granted. IV. Conclusion In accordance with the foregoing, the Court hereby orders that: 1.

The petition is DENIED and this action is DISMISSED pursuant to 28 U.S.C. § 1915A(b)(1) and the Court’s inherent power. 2. The pending motions are DENIED. 3. The clerk shall enter a separate order of dismissal SO ORDERED. /s/ Leo T. Sorokin Leo T. Sorokin United States District Judge