

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PRECEDENTIAL VALUE	nonprecedential district court memorandum and order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.)