

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Eric Rodney Hill v. E. Rickard

Eric Rodney Hill v. E. Rickard · No. Civil Action No. 25-02736 (UNA) · Decided March 4, 2026

SUMMARY

The U.S. District Court for the District of Columbia dismissed a habeas petition challenging a D.C. Superior Court conviction. The court held that 28 U.S.C. § 2254 relief was unavailable because the petitioner could pursue relief under D.C. Code § 23-110, and the local remedy was not inadequate or ineffective.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Tanya S. Chutkan
JURISDICTION	United States District Court for the District of Columbia
DECIDED	March 4, 2026
DOCKET	Civil Action No. 25-02736 (UNA)
DISPOSITION	dismissed
PROCEDURAL POSTURE	A District of Columbia prisoner filed a pro se petition for a writ of habeas corpus under 28 U.S.C. § 2254 in the Southern District of New York. The case was transferred to the District of Columbia because it challenged a District of Columbia conviction. The District Court dismissed the petition for lack of jurisdiction.
PRECEDENTIAL VALUE	published
PARTIES	Eric Rodney Hill v. E. Rickard

TOPICS

- federal habeas corpus
- post-conviction relief
- subject matter jurisdiction
- procedural due process

PRACTICE AREAS

- federal habeas corpus
- D.C. post-conviction relief
- federal jurisdiction

QUESTIONS PRESENTED

1. Whether a federal court may entertain a habeas petition by a District of Columbia prisoner challenging a District of Columbia Superior Court conviction when the asserted claims are available through a motion under D.C. Code § 23-110(a).
2. Whether the availability of the local § 23-110 remedy deprived the District Court of jurisdiction over the petition.

HOLDINGS

1. Under D.C. Code § 23-110(g), a federal court may not entertain a habeas petition by a District of Columbia prisoner who could seek relief through a motion under § 23-110(a), unless the local remedy is inadequate or ineffective to test the legality of the detention.
2. The District Court lacked jurisdiction to entertain the petition because Petitioner's claims were available locally under D.C. Code § 23-110(a).

KEY QUOTATIONS

“Because Petitioner’s claim is available locally by motion under § 23-110(a), this Court lacks jurisdiction to entertain his habeas petition.” (at 2)

“The remedy is “not a procedural bar to otherwise available federal habeas claims; it is Congress’s deliberate channeling of constitutional collateral attacks on Superior Court sentences to courts within the District’s judicial system (subject to Supreme Court review), with federal habeas available only as a safety valve.”” (at 2)

FACTUAL BACKGROUND

Eric Rodney Hill is a District of Columbia prisoner designated to the Federal Correctional Institution in Otisville, New York. He challenged a jury conviction entered in the District of Columbia Superior Court on September 13, 2022, alleging that the presiding judge, prosecutor, and public defender denied him legal rights, including procedural due process. He sought federal habeas relief under 28 U.S.C. § 2254.

PROCEDURAL HISTORY

Petitioner challenged his September 13, 2022 jury conviction in the District of Columbia Superior Court. The Southern District of New York transferred the habeas case to the District of Columbia. The District Court concluded that the claims could be raised through a motion under D.C. Code § 23-110(a), and therefore dismissed the federal habeas petition under § 23-110(g).

DISPOSITION

dismissed

CASES CITED

- *Garris v. Lindsay*, 794 F.2d 722, 726 (D.C. Cir. 1986)
- *Blair-Bey v. Quick*, 151 F.3d 1036, 1042 (D.C. Cir. 1998)

- Ibrahim v. United States, 661 F.3d 1141, 1146 (D.C. Cir. 2011)
- Williams v. Martinez, 586 F.3d 995, 998 (D.C. Cir. 2009)

OPINION

PER CURIAM.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA ERIC RODNEY HILL,)) Petitioner,)) Civil Action No. 25-02736 (UNA) v.)) E. RICKARD,)) Respondent.)
MEMORANDUM OPINION Petitioner is a District of Columbia prisoner designated to the Federal Correctional Institution in Otisville, New York. He filed in the U.S. District Court for the Southern District of New York a pro se petition for a writ of habeas corpus under 28 U.S.C. § 2254.

That court transferred the case here because the petition challenges a D.C. conviction. See Order, ECF No. 3. For the following reasons, this case will be dismissed. Petitioner challenges as “illegal and unconstitutional” his jury conviction entered in D.C. Superior Court on September 13, 2022. Pet. at 4; see *United States v. Hill*, 2019 CF3 015559 (D.C. Super.

Ct.) (Docket). He alleges, among other things, that the presiding judge, the prosecuting attorney, and his public defender denied him “every legal right” to which he was entitled, “including the right to procedural due process.” *Id.* at 4, 5, 6. Unlike prisoners challenging State or federal court convictions, “District of Columbia prisoner[s] ha[ve] no recourse to a federal judicial forum unless [it is shown that] the local remedy is inadequate or ineffective to test the legality of his detention.” *Garris v. Lindsay*, 794 F.2d 722, 726 (D.C.

Cir. 1986) (cleaned up). The local remedy, D.C. Code § 23-110, “establishe[s] a remedy analogous to 28 U.S.C. § 2255 for prisoners sentenced in D.C. Superior Court who wish[] to challenge their conviction or sentence.” *Blair-Bey v. Quick*, 151 F.3d 1036, 1042 (D.C. Cir. 1998).

As relevant here, [a]n application for a writ of habeas corpus in behalf of a prisoner who is authorized to apply for relief by motion pursuant to this section shall not be entertained by... any Federal... court if it appears that the applicant has failed to make a motion for relief under this section or that the Superior Court has denied him relief, unless it also appears that the remedy by motion is inadequate or ineffective to test the legality of his detention.

D.C. Code § 23-110(g). The remedy is “not a procedural bar to otherwise available federal habeas claims; it is Congress’s deliberate channeling of constitutional collateral attacks on Superior Court sentences to courts within the District’s judicial system (subject to Supreme Court review), with federal habeas available only as a safety valve.” *Ibrahim v. United States*, 661 F.3d 1141, 1146 (D.C.

Cir. 2011). Put simply, D.C. Code § 23-110(g) “divests federal courts of jurisdiction to hear habeas petitions by prisoners who could have raised viable claims pursuant to § 23-110(a).” *Williams v. Martinez*, 586 F.3d 995, 998 (D.C. Cir. 2009). Such claims include “the right to be released upon the ground that (1) the sentence was imposed in violation of the [U.S.]

Constitution or the laws of the District of Columbia” or “(4) the sentence is otherwise subject to collateral attack,” and a motion “may be made at any time.” D.C. Code § 23-110(a), (b)(1). Because Petitioner’s claim is available locally by motion under § 23-110(a), this Court lacks jurisdiction to entertain his habeas petition. Consequently, this case will be dismissed by separate order. _____/s/_____ TANYA S. CHUTKAN Date: March 4, 2026 United States District Judge 2