

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Joseph S. Hatley v. Warden

Hatley · No. JKB-25-0590; JKB-25-2658 · Decided March 6, 2026

SUMMARY

The United States District Court for the District of Maryland consolidated two habeas corpus proceedings brought by Joseph S. Hatley concerning disciplinary convictions and the loss of good conduct days. The court denied Hatley’s motions for default judgment, ordered the second petition docketed as a supplement in the lead case, closed the related action, and set deadlines for supplemental briefing.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	James K. Bredar
JURISDICTION	United States District Court for the District of Maryland
DECIDED	March 6, 2026
DOCKET	JKB-25-0590; JKB-25-2658
DISPOSITION	other
PROCEDURAL POSTURE	The court considered motions to consolidate two federal habeas proceedings and four motions for default judgment filed by petitioner.
STANDARD OF REVIEW	Entry of default and default judgment is discretionary; default judgment is disfavored and generally reserved for cases in which the adversary process has been halted by an unresponsive party.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Joseph S. Hatley v. Warden

TOPICS

- federal habeas corpus
- default judgment
- civil procedure
- due process

PRACTICE AREAS

- federal habeas corpus
- civil procedure
- post-conviction relief
- constitutional law

QUESTIONS PRESENTED

1. Whether the related habeas proceedings should be consolidated because they involved common parties and common issues of law and fact.
2. Whether Hatley was entitled to default judgment based on the respondent's delay in responding to a supplemental petition.

HOLDINGS

1. The proceedings should be consolidated because they involved the same parties and common, in some instances identical, issues of law and fact, and consolidation would promote judicial economy.
2. Hatley was not entitled to default judgment because the respondent had not halted the litigation by failing to plead or otherwise defend, and Hatley was not prejudiced by the delayed response.

KEY QUOTATIONS

“The failure to plead or defend does not automatically entitle a plaintiff to entry of default judgment.”

“Entry of default judgment is not favored and is reserved for cases where the adversary process has been halted by an unresponsive party.”

FACTUAL BACKGROUND

Hatley challenged disciplinary convictions arising from Incident Reports Nos. 3753909, 3850051, and 3757539, asserting due-process violations and seeking restoration of forfeited good-conduct days. His later petition concerned one of the same disciplinary convictions as the earlier consolidated proceedings. The respondent filed a motion to consolidate and other responsive filings, although one response was untimely because of an asserted administrative error.

PROCEDURAL HISTORY

Hatley filed petitions under 28 U.S.C. § 2241 challenging disciplinary convictions and the resulting loss of good-conduct days. The court had previously consolidated two related actions and then considered a later petition, motions to consolidate, and motions for default judgment. The court consolidated the actions, designated JKB-25-0590 as the lead case, denied default judgment, and set deadlines for supplemental briefing.

DISPOSITION

other

CASES CITED

- Dow v. Jones, 232 F. Supp. 2d 491, 494 (D. Md. 2002)
- United States v. Shaffer Equip. Co., 11 F.3d 450, 453 (4th Cir. 1993)

OPINION

Hatley

PER CURIAM.

1 IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND .

JOSEPH S. HATLEY, *

Petitioner, * . . * v. * Civil Action No. JKB-25-0590 . . * WARDEN, . □ te Respondent. ~ * ae eae
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JOSEPH S. HATLEY, *

Petitioner, * . : * v. * Civil Action No. JKB-25-2658 *

WARDEN, *

Respondent. kkk

MEMORANDUM AND ORDER

On May 13, 2025, the Court consolidated Civil Actions JKB-25-0590 and JKB-25-0591 because the petitions for writ of habeas corpus both concerned disciplinary convictions in which Petitioner Joseph S. Hatley was sanctioned with a loss of good conduct days. (ECF No. 6, Civ. Action No. JKB-25-0590 (“Hatley F’).) Since then, Hatley has filed another petition pursuant to 28 U.S.C. § 2241, Civil Action JKB-25-2658 (“Hatley IF”), Pending in Hatley H are the Respondent’s Motion to Consolidate (ECF No. 6) and Hatley’s Motion for Default Judgment (ECF No. 7). Respondent opposes Hatley’s Motion. (ECF No. 8.) Both Hatley and Respondent have filed similar motions in Hatley I. (See ECF Nos. 11, 12, 14, 15.) These requests will all be addressed together. . At issue in Hatley J is the loss of good conduct days for disciplinary convictions related to three Incident Reports, Nos. 3753909, 3850051, and 3757539. (ECF Nos. 1,4, 7.) Hatley H also seeks the return of good conduct days for Hatley’s conviction related to Incident Report No. 3850051. (ECF No. 1.) Hatley asserts that his due process rights were violated during all of the’ relevant disciplinary proceedings, and the parties are the same in each case. As these cases involve common issues of law and, in some cases, identical issues of fact, the Court finds that it is in the interest of judicial economy for all of these petitions to be handled together. Thus, the Court will grant the Motions to Consolidate. Hatley I will continue to serve as the lead case. Respondent will be granted leave to file a supplemental response to address Hatley’s Second Supplement to the Petition. _ Also pending are Hatley’s four motions seeking default judgment against Respondent. (Hatley I, ECF Nos. 11, 12, 15; Hatley If, ECF No. 7.) Pursuant to Rule 55(a), Federal Rules of Civil Procedure, default may be entered “[w]hen a party against whom a judgment for affirmative - relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise.” The failure to plead or defend does not automatically entitle a plaintiff to entry of default judgment. The decision to enter default is left to the discretion of this Court. See *Dow v. Jones*, 232 F. Supp. 2d 491, 494 (D. Md. 2002). Entry of default judgment is not favored and is reserved for cases where the adversary process has been halted by an unresponsive party. See ‘*United States v. Shaffer Equip. Co.*, 11 F.3d 450, 453 (4th Cir. 1993). Respondent argues that default is not available in habeas proceedings. However, even assuming such relief is available, Hatley is not entitled to it. Respondents have not halted this litigation. Admittedly, Respondent did not file a

response to Hatley's Supplemental Petition within 'the deadline set by the Court in Hatley F, they acknowledge as much in their opposition, citing administrative error, (ECF No. 17.) However, the Court does not find that Hatley has been prejudiced by this delay. Moreover, Hatley will be granted additional time to reply to the Response filed on August 19, 2025, and any Supplemental Response filed by Respondent. Further, Respondent did timely file the motion for consolidation in response to Hatley II, so Hatley's request for default judgment is ultimately unfounded. The Court will therefore deny the Motions for Default Judgment. Accordingly, it is hereby ORDERED that:

1. The Motions to Consolidate Cases filed in Hatley J] (ECF No. 14) and Hatley I] (ECF No. 6) are GRANTED;
2. The Clerk SHALL CONSOLIDATE these cases. The Petition filed in Civil Action No. JKB-25-2658 SHALL BE DOCKETED in Civil Action No. JKB-25-0590 as the Second Supplement to the Petition;
3. Hatley is REMINDED that all future pleadings related to his claims must note Civil Action No. JKB-25-0590 as the case number;
4. The Clerk SHALL CLOSE Civil Action No. JKB-25-2658;
5. The Motions for Default Judgment filed in Hatley J (ECF Nos. 11, 12, 15) and Hatley II (ECF No. 7) are DENIED;
6. Respondent is GRANTED 28 days from the date of this Order to file a Supplement to their Response to address the Second Supplement to the Petition;
7. Hatley MAY REPLY to Respondent's Response and Supplement within 28 days after service of Respondent's Supplement; and
8. The Clerk SHALL PROVIDE a copy of this Order to Hatley and counsel.

Dated this day of March, 2026. FOR THE COURT: James K. Bredar United States District Judge