

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Sean A. Fairweather v. Bainbridge, et al.

Fairweather · No. 3:25-CV-00790 · Decided April 2, 2026

SUMMARY

The United States District Court for the Middle District of Pennsylvania dismissed Sean A. Fairweather’s 28 U.S.C. § 2254 habeas petition without prejudice because his state court appeal remained pending and his claims were therefore unexhausted. The court denied Fairweather’s motions for default judgment, summary judgment, and injunctive relief as moot, and declined to issue a certificate of appealability.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Karoline Mehalchick
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	April 2, 2026
DOCKET	3:25-CV-00790
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner sought federal habeas relief under 28 U.S.C. § 2254 from a state-court resentencing while his state criminal appeal remained pending. The district court considered the respondent's motion to dismiss and petitioner's motions for default judgment, summary judgment, and injunctive relief.
STANDARD OF REVIEW	The court applied the statutory exhaustion requirement under 28 U.S.C. § 2254 and determined that federal habeas relief was unavailable while the state appellate proceedings remained pending.
PRECEDENTIAL VALUE	unpublished, nonprecedential district-court memorandum
PARTIES	Sean A. Fairweather v. Bainbridge, et al., Jasen Bohinski

TOPICS

- federal habeas corpus
- post-conviction relief
- motions to dismiss
- default judgment
- summary judgment

PRACTICE AREAS

federal habeas corpus

post-conviction relief

appellate procedure

civil procedure

constitutional law

QUESTIONS PRESENTED

1. Whether the § 2254 petition should be dismissed without prejudice because Fairweather had not exhausted available state-court remedies while his state appeal remained pending.
2. Whether Fairweather's motions for default judgment, summary judgment, and injunctive relief should be denied as moot after dismissal of the habeas petition.
3. Whether a certificate of appealability should issue.

HOLDINGS

1. The petition had to be dismissed without prejudice because Fairweather had not exhausted available state-court remedies and his state criminal appeal remained pending.
2. The motions for default judgment, summary judgment, and injunctive relief were denied as moot because the habeas petition was dismissed without prejudice.
3. No certificate of appealability would issue because reasonable jurists would not find the procedural disposition debatable.

KEY QUOTATIONS

“To satisfy the exhaustion requirement, a petitioner must invoke “one complete round” of the applicable state’s appellate review process, thereby giving the courts of that state “one full opportunity” to resolve any issues relevant to such claims.” (at 3)

“Based on the foregoing, the Court will dismiss the petition without prejudice, deny all motions for default as moot, deny the motion for summary judgment as moot deny the motion for injunctive relief as moot, and close the case.” (at 6)

FACTUAL BACKGROUND

Fairweather challenged a February 25, 2025 state-court resentencing on double jeopardy, due process, and equal protection grounds. His criminal action remained pending on appeal in the Pennsylvania Superior Court, with no final appellate order entered. He was transferred from Lackawanna County Prison to SCI-Dallas, resulting in the substitution of SCI-Dallas Warden Jasen Bohinski as the sole respondent.

PROCEDURAL HISTORY

Fairweather filed a § 2254 petition challenging his February 25, 2025 resentencing. The court dismissed the initial petition for failure to name a proper respondent and permitted amendment; after several amended petitions and a transfer to SCI-Dallas, Jasen Bohinski became the sole respondent. Bohinski moved to dismiss after demonstrating that Fairweather's state appeal remained pending. The court dismissed the habeas petition without prejudice for failure to exhaust state remedies and denied the remaining motions as moot.

DISPOSITION

dismissed

CASES CITED

- Wilkerson v. Sup't Fayette SCI, 871 F.3d 221, 227 (3d Cir. 2017)
- Whitney v. Horn, 280 F.3d 240, 250 (3d Cir. 2002)
- Lines v. Larkins, 208 F.3d 153, 159 (3d Cir. 2000)
- O'Sullivan v. Boerckel, 526 U.S. 838, 845 (1999)
- Lambert v. Blackwell, 387 F.3d 210, 233 (3d Cir. 2004)
- McCandless v. Vaughn, 172 F.3d 255, 261 (3d Cir. 1999)
- Crews v. Horn, 360 F.3d 146, 151 (3d Cir. 2004)
- Stephens v. Dieter, No. 3:25-337, 2026 WL 819605
- Slack v. McDaniel, 529 U.S. 473, 484 (2000)