UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Schatz v. Warden

Schatz v. Warden · No. Civ. No. DLB-23-1433 · Decided April 27, 2026

SUMMARY

The United States District Court for the District of Maryland dismissed Jeffrey Schatz's 28 U.S.C. § 2254 habeas petition as untimely under the one-year statute of limitations. The court rejected equitable-tolling arguments based on unfamiliarity with the law, limited law-library access, indigency, the COVID-19 pandemic, and purported new legal developments. The court also denied a certificate of appealability.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Deborah L. Boardman
JURISDICTION	United States District Court for the District of Maryland
DECIDED	April 27, 2026
DOCKET	Civ. No. DLB-23-1433
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner sought federal habeas relief under 28 U.S.C. § 2254. The respondent moved to dismiss or answered that the petition was untimely. The district court dismissed the petition as time-barred and denied a certificate of appealability.
STANDARD OF REVIEW	The court applied the one-year limitations period governing § 2254 petitions, statutory tolling under 28 U.S.C. § 2244(d)(2), and the equitable-tolling standard requiring reasonable diligence and an extraordinary circumstance that prevented timely filing. For a certificate of appealability after a procedural dismissal, the petitioner must show that reasonable jurists could debate both the validity of the constitutional claim and the procedural ruling.
PRECEDENTIAL VALUE	unpublished
PARTIES	Jeffrey Schatz v. Warden

TOPICS

federal habeas corpus | statute of limitations | post-conviction relief | civil procedure

PRACTICE AREAS

federal habeas corpus | post-conviction relief | criminal procedure

QUESTIONS PRESENTED

1. Whether Schatz's § 2254 petition was filed within the one-year federal habeas limitations period.
2. Whether statutory or equitable tolling excused the untimely filing.
3. Whether a certificate of appealability should issue after dismissal on procedural grounds.

HOLDINGS

1. The petition was untimely because Schatz's conviction became final on April 10, 2020, when the time for seeking direct review expired, and the one-year limitations period expired on April 10, 2021.
2. Statutory tolling did not apply because Schatz did not file a properly filed state post-conviction or other collateral application before the federal limitations period expired.
3. Equitable tolling was unwarranted because Schatz did not demonstrate reasonable diligence or an extraordinary circumstance that prevented timely filing.
4. A certificate of appealability shall not issue because Schatz did not demonstrate that reasonable jurists could debate either the validity of his constitutional claims or the correctness of the procedural dismissal.

KEY QUOTATIONS

> *"To equitably toll the limitations period, the habeas petitioner must demonstrate "(1) that he has been pursuing his rights diligently, and (2) that some extraordinary circumstance stood in his way and prevented timely filing.""* (II)

> *"No extraordinary circumstances stood in the way of Schatz filing his habeas petition by April 10, 2021."* (III)

FACTUAL BACKGROUND

Schatz was arrested and arraigned in Baltimore City on September 19, 2019, and convicted after a bench trial on March 11, 2020, of several offenses. He was sentenced that day to seven years of incarceration, with six years suspended, and three years of probation. Although Schatz claimed that he had appealed and later withdrew the appeal under prosecutorial pressure, the record and state docket showed no filed appeal. He filed his federal habeas petition on May 25, 2023, alleging coerced abandonment of an appeal, insufficient evidence, and fraudulent charges.

PROCEDURAL HISTORY

Schatz was convicted in the District Court for Baltimore City, Maryland, on several state criminal charges and sentenced on March 11, 2020. He did not establish that he filed a direct appeal or any state collateral proceeding

before the federal limitations period expired. He filed his § 2254 petition on May 25, 2023; the respondent asserted the one-year statute of limitations, and the court rejected Schatz's equitable-tolling arguments.

DISPOSITION

dismissed

CASES CITED

- Fisher v. Lee, 215 F.3d 438, 455 (4th Cir. 2000)
- Maleng v. Cook, 490 U.S. 488, 493 (1989)
- Whiteside v. United States, 775 F.3d 180, 184 (4th Cir. 2014)
- Rouse v. Lee, 339 F.3d 238 (4th Cir. 2003)
- Harris v. Hutchinson, 209 F.3d 325, 330 (4th Cir. 2000)
- Holland v. Florida, 560 U.S. 631, 649, 653 (2010)
- Alvarez-Machain v. United States, 107 F.3d 696, 700 (9th Cir. 1996)
- United States v. Sosa, 364 F.3d 507, 512 (4th Cir. 2004)
- Gales v. Warden Deyena Corp., No. RDB-12-3614, 2013 WL 1352309, at *3 (D. Md. Apr. 1, 2013)
- Jones v. Graham, No. CCB-17-3523, 2019 WL 1935412, at *2 (D. Md. May 1, 2019)
- United States v. Aigbekaen, No. JKB-15-0462, 2021 WL 1816967, at *1 (D. Md. May 6, 2021)
- Donald v. Pruitt, 853 F. App'x 230, 234 (10th Cir. 2021)
- United States v. Henry, No. 17-CR-00180, 2020 WL 7332657, at *4 (W.D. Pa. Dec. 14, 2020)
- Rose v. Lee, 252 F.3d 676, 684-685 (4th Cir. 2001)
- Slack v. McDaniel, 529 U.S. 473, 484 (2000)
- Lyons v. Lee, 316 F.3d 528, 532 (4th Cir. 2003)

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