

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Willis v. Warden, USP Canaan

Willis · No. 3:25-cv-02478 · Decided December 23, 2025

SUMMARY

The United States District Court for the Middle District of Pennsylvania dismisses Eugene Willis’s 28 U.S.C. § 2241 petition for lack of jurisdiction. Willis sought to vacate his § 924(c) conviction based on Supreme Court decisions including Taylor, Davis, and Rosemond. The court holds that his challenge must be brought under 28 U.S.C. § 2255 in the sentencing court and that § 2241 is unavailable merely because procedural restrictions may bar relief under § 2255.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Judge Munley
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	December 23, 2025
DOCKET	3:25-cv-02478
DISPOSITION	dismissed
PROCEDURAL POSTURE	Willis filed a pro se petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging the validity of his § 924(c) conviction. The Middle District of Florida transferred the petition to the Middle District of Pennsylvania because Willis was confined in that district. After preliminary review, the court dismissed the petition without prejudice for lack of jurisdiction.
STANDARD OF REVIEW	On preliminary review under Rule 4 of the Rules Governing Section 2254 Cases, applied in the court's discretion to § 2241 proceedings, the court may dismiss a habeas petition when it is plain from the petition that the petitioner is not entitled to relief.
PRECEDENTIAL VALUE	unpublished, nonprecedential district-court memorandum
PARTIES	Eugene Willis v. Warden, USP Canaan

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether a federal prisoner may use a 28 U.S.C. § 2241 petition to challenge the validity of a § 924(c) conviction based on intervening legal decisions when relief remains available, though potentially subject to procedural restrictions, under 28 U.S.C. § 2255.
2. Whether the Middle District of Pennsylvania had jurisdiction over Willis's § 2241 petition.

HOLDINGS

1. A federal prisoner may not use § 2241 to challenge the validity of a conviction when it is not essentially impossible or impracticable to seek relief in the sentencing court under § 2255, even if the prisoner may be barred by § 2255's limitations on successive motions or other procedural restrictions.
2. The court lacked jurisdiction over Willis's § 2241 petition because the petition challenged the validity of his conviction and it was not essentially impossible for him to seek relief under § 2255 in the sentencing court.

KEY QUOTATIONS

“Section 2241 confers federal jurisdiction over a habeas petition that has been filed by a federal inmate challenging “not the validity but the execution of [their] sentence.”” (at 3)

“Thus, so long as it is not essentially impossible to pursue a § 2255 motion, federal law requires a petitioner to challenge his conviction only through a motion brought pursuant to § 2255, regardless of whether the petitioner can meet that statute’s gatekeeping restrictions.” (at 4)

“When an inmate files a habeas petition pursuant to § 2241 challenging his conviction and it is not essentially “impossible” for him to resort to § 2255, the habeas court will lack jurisdiction over the petition and must dismiss it for lack of jurisdiction.” (at 5)

FACTUAL BACKGROUND

On February 15, 2018, a jury in the Middle District of Florida convicted Willis of two counts of carjacking and one count of brandishing a firearm in furtherance of a crime of violence under 18 U.S.C. § 924(c). He received a total sentence of 204 months' imprisonment and five years of supervised release. After unsuccessful direct and collateral challenges, Willis filed this § 2241 petition arguing that his § 924(c) conviction was unlawful in light of Taylor, Davis, and Rosemond.

PROCEDURAL HISTORY

A Middle District of Florida jury convicted Willis of two carjacking counts and one firearm-brandishing count under 18 U.S.C. § 924(c), and the sentencing court imposed a 204-month prison term followed by five years of

supervised release. The Eleventh Circuit affirmed, the Middle District of Florida denied Willis's § 2255 motion, the Eleventh Circuit denied a certificate of appealability, and the Supreme Court denied certiorari. Willis then filed this § 2241 petition, which was transferred from the Middle District of Florida to the Middle District of Pennsylvania.

DISPOSITION

dismissed

CASES CITED

- United States v. Willis, 769 F. App'x 863 (11th Cir.)
- United States v. Taylor, 596 U.S. 845 (2022)
- United States v. Davis, 588 U.S. 445 (2019)
- Rosemond v. United States, 572 U.S. 65 (2015)
- Cardona v. Bledsoe, 681 F.3d 533 (3d Cir.)
- Woodall v. Federal Bureau of Prisons, 432 F.3d 235 (3d Cir.)
- Barden v. Keohane, 921 F.2d 476 (3d Cir.)
- Coady v. Vaughn, 251 F.3d 480 (3d Cir.)
- Rodriguez v. Warden Lewisburg USP, 645 F. App'x 110 (3d Cir.)
- Okereke v. United States, 307 F.3d 117 (3d Cir.)
- In re Dorainvil, 119 F.3d 245 (3d Cir.)
- Jones v. Hendrix, 599 U.S. 465 (2023)
- Voneida v. Johnson, 88 F.4th 233 (3d Cir.)

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