

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Watkins v. Tuolumne County Superior Court

No. 1:25-cv-00273-EPG-HC, United States District Court for the Eastern District of California (March 20, 2025)

SUMMARY

A United States Magistrate Judge recommends dismissing without prejudice a pro se pretrial detainee’s 28 U.S.C. § 2241 habeas petition. The recommendation concludes that Younger v. Harris abstention applies because the petitioner’s state criminal proceedings are ongoing, implicate important state interests, provide an adequate opportunity to raise constitutional claims, and would be practically enjoined by federal habeas relief. The court also directs the Clerk to assign a district judge and allows the petitioner 30 days to file objections.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	March 20, 2025
DOCKET	1:25-cv-00273-EPG-HC
DISPOSITION	dismissed
PROCEDURAL POSTURE	State pretrial detainee filed a pro se federal habeas petition under 28 U.S.C. § 2241 challenging ongoing state criminal proceedings. A magistrate judge issued findings and a recommendation that the petition be dismissed without prejudice under Younger abstention and directed assignment of a district judge.
STANDARD OF REVIEW	Preliminary habeas review under Rule 4 of the Rules Governing Section 2254 Cases; dismissal is permitted when it plainly appears from the petition and attached exhibits that the petitioner is not entitled to relief.
PRECEDENTIAL VALUE	Nonprecedential findings and recommendation; subject to district judge review
PARTIES	Raymond Chad Watkins v. Tuolumne County Superior Court

TOPICS

- federal habeas corpus
- habeas corpus
- criminal procedure
- civil procedure
- federalism

PRACTICE AREAS

federal habeas corpus

criminal procedure

constitutional law

federalism

QUESTIONS PRESENTED

1. Whether Younger abstention required dismissal of a § 2241 habeas petition filed by a state pretrial detainee while state criminal proceedings were ongoing.
2. Whether the petition alleged bad faith, harassment, a colorable double-jeopardy claim, or another extraordinary circumstance sufficient to overcome Younger abstention.
3. Whether the petition could be dismissed at preliminary review under Rule 4 of the Rules Governing Section 2254 Cases.

HOLDINGS

1. Younger abstention was appropriate because the petition concerned an ongoing state criminal prosecution, the prosecution implicated important state interests, the state proceedings provided an adequate opportunity to raise constitutional challenges, and habeas relief would have the practical effect of enjoining or interfering with the state prosecution.
2. No exception to Younger abstention applied because the petitioner did not show bad faith, harassment, irreparable harm, a colorable double-jeopardy claim, or another extraordinary circumstance.
3. The petition should be dismissed without prejudice at preliminary review because it plainly appeared that the petitioner was not entitled to federal relief while the state criminal proceedings remained pending.

KEY QUOTATIONS

“Younger abstention is appropriate when: (1) there is ‘an ongoing state judicial proceeding’; (2) the proceeding ‘implicate[s] important state interests’; (3) there is ‘an adequate opportunity in the state proceedings to raise constitutional challenges’; and (4) the requested relief ‘seek[s] to enjoin’ or has ‘the practical effect of enjoining’ the ongoing state judicial proceeding.” (at 2)

“Petitioner has not “alleged and proved” that the state prosecution was undertaken “in bad faith or [is] motivated by a desire to harass.”” (at 3)

FACTUAL BACKGROUND

Raymond Chad Watkins was confined in the Tuolumne County jail as a state pretrial detainee and was involved in ongoing criminal proceedings in the Tuolumne County Superior Court. He had apparently not yet been sentenced. His federal petition alleged discriminatory and vindictive prosecution, perjured testimony, evidence tampering, witness tampering, prosecutorial misconduct, judicial corruption, and, briefly, a possible double-jeopardy violation.

PROCEDURAL HISTORY

Watkins filed the petition on March 3, 2025, while confined in the Tuolumne County jail and involved in pending state criminal proceedings. The magistrate judge conducted preliminary review under Rule 4 of the Rules Governing Section 2254 Cases, applied Younger abstention, recommended dismissal without prejudice, and advised that the assigned district judge would review the recommendation after any objections.

DISPOSITION

dismissed

CASES CITED

- Younger v. Harris, 401 U.S. 37 (1971)
- Arevalo v. Hennessy, 882 F.3d 763, 765-66 (9th Cir. 2018)
- ReadyLink Healthcare, Inc. v. State Compensation Ins. Fund, 754 F.3d 754, 758 (9th Cir. 2014)
- Duke v. Gastelo, 64 F.4th 1088, 1094 (9th Cir. 2023)
- Bean v. Matteucci, 986 F.3d 1128, 1133-36 (9th Cir. 2021)
- World Famous Drinking Emporium, Inc. v. City of Tempe, 820 F.2d 1079, 1082 (9th Cir. 1987)
- Dominguez v. Kernan, 906 F.3d 1127, 1131 n.5 (9th Cir. 2018)
- Page v. King, 932 F.3d 898, 901-02 (9th Cir. 2019)
- Pennzoil Co. v. Texaco, 481 U.S. 1, 15 (1987)
- Kugler v. Helfant, 421 U.S. 117, 124 (1975)
- Juidice v. Vail, 430 U.S. 327, 338 (1977)
- Wilkerson v. Wheeler, 772 F.3d 834, 839 (9th Cir. 2014)
- Baxter v. Sullivan, 923 F.2d 1391, 1394 (9th Cir. 1991)

OPINION

(HC) Watkins v. Tuolumne County Superior Court
PER CURIAM.

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UNITED STATES DISTRICT COURT

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EASTERN DISTRICT OF CALIFORNIA

10 11 RAYMOND CHAD WATKINS, Case No. 1:25-cv-00273-EPG-HC 12 Petitioner,
FINDINGS AND RECOMMENDATION

RECOMMENDING DISMISSAL OF

13 v. PETITION FOR WRIT OF HABEAS

CORPUS WITHOUT PREJUDICE

14 TUOLUMNE COUNTY SUPERIOR

COURT, ORDER DIRECTING CLERK OF COURT

15 TO ASSIGN DISTRICT JUDGE

Respondent. 16 17 Petitioner Raymond Watkins is a state pretrial detainee proceeding pro se with a petition 18 for writ of habeas corpus pursuant to 28 U.S.C. § 2241. Petitioner is currently involved in 19 criminal proceedings in the Tuolumne County Superior Court. It appears Petitioner has not yet 20 been sentenced. Accordingly, the undersigned declines to intervene in the state proceedings and 21 recommends dismissal of the petition without prejudice based on *Younger v. Harris*, 401 U.S. 37 22 (1971). 23 I.

24 BACKGROUND

25 Petitioner is currently confined at the Tuolumne County jail. (ECF No. 1 at 1.1) On 26 March 3, 2025, Petitioner filed the instant federal habeas petition, wherein Petitioner asserts that

27 1 he was subjected to a discriminatory and vindictive prosecution and alleges use of perjured 2 testimony, evidence tampering, witness tampering, prosecutorial misconduct, and judicial 3 corruption. (ECF No. 1 at 3.) 4 II.

5 DISCUSSION

6 Rule 4 of the Rules Governing Section 2254 Cases² requires preliminary review of a 7 habeas petition and allows a district court to dismiss a petition before the respondent is ordered 8 to file a response, if it “plainly appears from the petition and any attached exhibits that the 9 petitioner is not entitled to relief in the district court” Rule 4, Rules Governing Section 2254 10 Cases in the United States District Courts, 28 U.S.C. foll. § 2254. 11 In *Younger v. Harris*, the Supreme Court held that when there is a pending state criminal 12 proceeding, federal courts must refrain from enjoining the state prosecution absent special or 13 extraordinary circumstances. 401 U.S. at 45. 14 We have articulated a four-part test to determine when *Younger* requires that federal courts abstain from adjudicating cases that 15 would enjoin or risk interfering with pending state-court proceedings. “*Younger* abstention is appropriate when: (1) there is 16 ‘an ongoing state judicial proceeding’; (2) the proceeding ‘implicate[s] important state interests’; (3) there is ‘an adequate 17 opportunity in the state proceedings to raise constitutional challenges’; and (4) the requested relief ‘seek[s] to enjoin’ or has 18 ‘the practical effect of enjoining’ the ongoing state judicial proceeding.” *Arevalo v. Hennessy*, 882 F.3d 763, 765 (9th Cir. 19 2018) (alterations in original) (quoting *ReadyLink Healthcare, Inc. v. State Compensation Ins. Fund*, 754 F.3d 754, 758 (9th Cir. 20 2014)). 21 *Duke v. Gastelo*, 64 F.4th 1088, 1094 (9th Cir. 2023). “Abstention is only appropriate when all 22 four requirements are met.” *Id.* 23 “But even where the *Younger* factors are satisfied, ‘federal courts do not invoke it if there 24 is a showing of bad faith, harassment, or some other extraordinary circumstance that would make 25 abstention inappropriate.’” *Bean v. Matteucci*, 986 F.3d 1128, 1133 (9th Cir. 2021) (some 26 27 2 The Rules Governing Section 2254 Cases apply to § 2241 habeas petitions. See Rule 1(b) of the Rules Governing Section 2254 Cases (“The district court may apply any or all of these rules to a habeas corpus petition not covered 1 internal quotation marks omitted) (quoting *Arevalo v. Hennessy*, 882 F.3d 763, 765–66 (9th Cir. 2 2018)). The Ninth Circuit has “recognized an irreparable harm exception to *Younger*,” *Bean*, 986 3

F.3d at 1133 (citing *World Famous Drinking Emporium, Inc. v. City of Tempe*, 820 F.2d 1079, 4 1082 (9th Cir. 1987)), and has applied this exception to claims raised by pretrial detainees in the 5 following contexts: (1) “where a pretrial detainee presents ‘[a] colorable claim that a state 6 prosecution [would] violate the Double Jeopardy Clause,’” *Bean*, 986 F.3d at 1133 (quoting 7 *Dominguez v. Kernan*, 906 F.3d 1127, 1131 n.5 (9th Cir. 2018)); (2) “where a petitioner raised a 8 due process challenge to his pretrial detention in the context of a state civil sexually violent 9 predator proceeding,” *Bean*, 986 F.3d at 1133 (citing *Page v. King*, 932 F.3d 898, 901–02 (9th 10 Cir. 2019)); and (3) where a pretrial detainee challenged a court order authorizing forcible 11 administration of antipsychotic medications, *Bean*, 986 F.3d at 1134–36. 12 Here, all four Younger factors are satisfied. There is an ongoing state criminal 13 prosecution, and state criminal prosecutions implicate important state interests. There is an 14 adequate opportunity in Petitioner’s state proceedings, whether at the trial level or on appeal, to 15 raise constitutional challenges. See *Penzoil Co. v. Texaco*, 481 U.S. 1, 15 (1987) (holding that 16 federal courts should assume that state procedures will afford an adequate opportunity for 17 consideration of constitutional claims “in the absence of unambiguous authority to the 18 contrary”); *Kugler v. Helfant*, 421 U.S. 117, 124 (1975) (“[O]rdinarily a pending state 19 prosecution provides the accused a fair and sufficient opportunity for vindication of federal 20 constitutional rights.”). Granting habeas relief has the practical effect of enjoining the ongoing 21 state criminal prosecution. Further, Petitioner has not made any showing of extraordinary 22 circumstances that would render abstention inappropriate. Petitioner has not “alleged and 23 proved” that the state prosecution was undertaken “in bad faith or [is] motivated by a desire to 24 harass.” *Juidice v. Vail*, 430 U.S. 327, 338 (1977) (emphasis added). Although the petition 25 mentions double jeopardy, (ECF No. 1 at 2), Petitioner does not present a colorable claim that 26 his prosecution violates the Double Jeopardy Clause. Accordingly, the Court finds that 27 abstention is appropriate. 1 Il.

2 RECOMMENDATION & ORDER

3 Based on the foregoing, the undersigned HEREBY RECOMMENDS that the petition for 4 | writ of habeas corpus be DISMISSED without prejudice based on *Younger v. Harris*, 401 U.S. 5 | 37 (1971). 6 Further, the Clerk of Court is DIRECTED to randomly assign a District Court Judge to 7 | the present matter. 8 This Findings and Recommendation is submitted to the assigned United States District 9 | Court Judge, pursuant to the provisions of 28 U.S.C. § 636 (b)(1)(B) and Rule 304 of the Local 10 | Rules of Practice for the United States District Court, Eastern District of California. Within 11 | THIRTY (30) days after service of the Findings and Recommendation, Petitioner may file 12 | written objections, no longer than fifteen (15) pages, including exhibits, with the Court and 13 | serve a copy on all parties. Such a document should be captioned “Objections to Magistrate 14 | Judge’s Findings and Recommendation.” The assigned United States District Court Judge will 15 | then review the Magistrate Judge’s ruling pursuant to 28 U.S.C. § 636(b)(1)(C). The parties are 16 | advised that failure to file objections within the specified time may waive the right to appeal the 17 | District Court’s order. *Wilkerson v. Wheeler*,

772 F.3d 834, 839 (9th Cir. 2014) (citing Baxter v. 18 | Sullivan, 923 F.2d 1391, 1394 (9th Cir.
1991)). 19 IT IS SO ORDERED. 21| Dated: _ March 20, 2025 [spe ey
09 UNITED STATES MAGISTRATE JUDGE
23 24 25 26 27 28