

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PRECEDENTIAL VALUE	Nonprecedential findings and recommendation; subject to district judge review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)