

**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)

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. 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

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