

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH
CAROLINA, GREENVILLE DIVISION

Willis T. Jackson v. Scotty Bodiford

Jackson v. Bodiford · No. 6:25-cv-14007-JDA · Decided March 3, 2026

SUMMARY

The United States District Court for the District of South Carolina adopted the magistrate judge’s Report and Recommendation and dismissed Willis T. Jackson’s pro se 28 U.S.C. § 2241 habeas petition based on failure to exhaust state remedies and abstention under *Younger v. Harris*. The court reviewed the unobjected-to Report for clear error and denied a certificate of appealability.

CASE DETAILS

COURT	United States District Court for the District of South Carolina, Greenville Division
WRITING FOR THE COURT	Jacquelyn D. Austin
JURISDICTION	United States District Court for the District of South Carolina, Greenville Division
DECIDED	March 3, 2026
DOCKET	6:25-cv-14007-JDA
DISPOSITION	dismissed
PROCEDURAL POSTURE	A pro se pretrial detainee filed a petition for a writ of habeas corpus under 28 U.S.C. § 2241. The matter was referred to a magistrate judge, who recommended summary dismissal without prejudice, without leave to amend, and without issuance and service of process. The district court reviewed the unobjected-to report for clear error and accepted the recommendation.
STANDARD OF REVIEW	In the absence of specific objections to a magistrate judge's report and recommendation, the district court reviews the report for clear error rather than conducting de novo review.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Willis T. Jackson v. Scotty Bodiford

TOPICS

federal habeas corpus

motions to dismiss

civil procedure

PRACTICE AREAS

federal habeas corpus

civil procedure

post-conviction relief

QUESTIONS PRESENTED

1. Whether the district court should review the unobjected-to report and recommendation for clear error.
2. Whether the § 2241 petition should be dismissed because the claims were unexhausted and federal intervention was barred by *Younger v. Harris*.
3. Whether a certificate of appealability should issue.

HOLDINGS

1. When a party files no timely specific objection to a magistrate judge's report and recommendation, the district court need not conduct de novo review and instead must determine whether the report contains clear error on the face of the record.
2. The petition was dismissed on procedural grounds because Jackson's claims were unexhausted and federal intervention was barred by *Younger v. Harris*; the dismissal was without prejudice to the extent stated by the court and was not a merits determination.
3. A certificate of appealability would not issue because Jackson failed to satisfy the applicable substantial-showing standard for relief denied on procedural grounds.

KEY QUOTATIONS

“in the absence of a timely filed objection, a district court need not conduct a de novo review, but instead must only satisfy itself that there is no clear error on the face of the record in order to accept the recommendation”

“Accordingly, the Petition is DISMISSED with prejudice, not on the merits, under Younger and for failure to exhaust state court remedies, without prejudice.”

FACTUAL BACKGROUND

Jackson was a pretrial detainee who filed a pro se petition for a writ of habeas corpus under § 2241. The magistrate judge determined that Jackson's claims had not been exhausted in state court and that federal intervention was barred by *Younger* abstention. Jackson did not object to the report or otherwise respond before the objection period expired.

PROCEDURAL HISTORY

Jackson filed a § 2241 habeas petition on December 29, 2025. On February 2, 2026, the magistrate judge recommended dismissal because the claims were unexhausted and barred by *Younger v. Harris*. Jackson filed no objections. The district court accepted the report, dismissed the petition on procedural grounds, and denied a certificate of appealability.

DISPOSITION

dismissed

CASES CITED

- *Younger v. Harris*, 401 U.S. 37 (1971)
- *Mathews v. Weber*, 423 U.S. 261, 270-71 (1976)
- *Diamond v. Colonial Life & Accident Ins.*, 416 F.3d 310, 315 (4th Cir. 2005)
- *Nivens v. Gilchrist*, 444 F.3d 237, 247 (4th Cir. 2006)
- *Slack v. McDaniel*, 529 U.S. 473, 484-85 (2000)
- *Miller-El v. Cockrell*, 537 U.S. 322, 336-38 (2003)

OPINION

IN THE DISTRICT COURT OF THE UNITED STATES FOR THE DISTRICT OF SOUTH CAROLINA GREENVILLE DIVISION Willis T. Jackson) Case No. 6:25-cv-14007-JDA)
Petitioner,)) v.) OPINION AND ORDER) Scotty Bodiford,)) Respondent.) This matter is
before the Court on a Report and Recommendation (“Report”) of the Magistrate Judge. [Doc. 9.]

In accordance with 28 U.S.C. § 636(b) and Local Civil Rule 73.02(B)(2), D.S.C., this matter was referred to United States Magistrate Judge Kevin McDonald for pre-trial proceedings. On December 29, 2025, the Clerk docketed a petition for a writ of habeas corpus filed pro se by a pretrial detainee pursuant to 28 U.S.C. § 2241. [Doc. 1.]

On February 2, 2026, the Magistrate Judge issued a Report recommending that the matter be summarily dismissed without prejudice, without leave to amend, and without issuance and service of process because Petitioner’s claims were unexhausted and barred by *Younger v. Harris*, 401 U.S. 37 (1971). [Doc. 9.]

The Magistrate Judge advised Petitioner of the procedures and requirements for filing objections to the Report and the serious consequences if he failed to do so. [Id. at 7.] Petitioner has not filed objections or otherwise responded to the Report, and the time to do so has lapsed.

The Magistrate Judge makes only a recommendation to this Court. The recommendation has no presumptive weight, and the responsibility to make a final determination remains with the Court. See *Mathews v. Weber*, 423 U.S. 261, 270–71 (1976).

The Court is charged with making a de novo determination of any portion of the Report of the Magistrate Judge to which a specific objection is made. The Court may accept, reject, or modify, in whole or in part, the recommendation made by the Magistrate Judge or recommit the matter to the Magistrate Judge with instructions. See 28 U.S.C. § 636(b).

The Court will review the Report only for clear error in the absence of an objection. See *Diamond v. Colonial Life & Accident Ins.*, 416 F.3d 310, 315 (4th Cir. 2005) (stating that “in the absence of a timely filed objection, a district court need not conduct a de novo review, but instead must only satisfy itself that there is no clear error on the face of the record in order to accept the recommendation” (internal quotation marks omitted)).

The Court has reviewed the record in this case, the applicable law, and the Report of the Magistrate Judge for clear error. Having done so, the Court accepts the Report and Recommendation of the Magistrate Judge and incorporates it by reference to the extent consistent with this Order.

Accordingly, the Petition is DISMISSED with prejudice, not on the merits, under *Younger* and for failure to exhaust state court remedies, without prejudice. See *Nivens v. Gilchrist*, 444 F.3d 237, 247 (4th Cir. 2006). IT IS SO ORDERED. CERTIFICATE OF APPEALABILITY “The district court must issue or deny a certificate of appealability when it enters a final order adverse to the applicant.” Rule 11(a) of the Rules Governing Section 2254 Cases; see Rule 1(b) of the Rules Governing Section 2254 Cases (stating that a district court may apply these rules to a habeas petition not filed pursuant to § 2254).

A certificate of appealability will not issue absent “a substantial showing of the denial of a constitutional right.” 28 U.S.C. § 2253(c)(2). When the district court denies relief on the merits, a petitioner satisfies this standard by demonstrating that reasonable jurists would find that the court’s assessment of the constitutional claims is debatable or wrong.

Slack v. McDaniel, 529 U.S. 473, 484 (2000); see *Miller-El v. Cockrell*, 537 U.S. 322, 336–38 (2003). When the district court denies relief on procedural grounds, the prisoner must demonstrate both that the dispositive procedural ruling is debatable, and that the petition states a debatable claim of the denial of a constitutional right. *Slack*, 529 U.S. at 484–85.

In this case, the legal standard for the issuance of a certificate of appealability has not been met. s/
Jacquelyn D. Austin United States District Judge March 3, 2026 Greenville, South Carolina