

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PRECEDENTIAL VALUE	unpublished district court opinion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)

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