

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF  
WEST VIRGINIA

Juvonta Lafond v. FCI Beckley Warden

Lafond · No. 5:23-cv-00718 · Decided January 28, 2026

SUMMARY

The United States District Court for the Southern District of West Virginia adopts a magistrate judge’s proposed findings and recommendation in Juvonta Lafond’s 28 U.S.C. § 2241 habeas petition. Because Lafond was released from custody and no objections were filed, the court dismisses the petition as moot and removes the action from the docket.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                               |
|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Southern District of West Virginia                                                                                                                                                                                                       |
| WRITING FOR THE COURT | W. Volk                                                                                                                                                                                                                                                                       |
| JURISDICTION          | United States District Court for the Southern District of West Virginia                                                                                                                                                                                                       |
| DECIDED               | January 28, 2026                                                                                                                                                                                                                                                              |
| DOCKET                | 5:23-cv-00718                                                                                                                                                                                                                                                                 |
| DISPOSITION           | dismissed                                                                                                                                                                                                                                                                     |
| PROCEDURAL POSTURE    | Petition for a writ of habeas corpus under 28 U.S.C. § 2241; the district court reviewed a magistrate judge's proposed findings and recommendation and dismissed the petition as moot after the petitioner's release from custody.                                            |
| STANDARD OF REVIEW    | De novo review applies to portions of a magistrate judge's proposed findings and recommendation to which a timely objection is made. No de novo review is required for unobjected-to portions or for general and conclusory objections that do not identify a specific error. |
| PRECEDENTIAL VALUE    | nonprecedential                                                                                                                                                                                                                                                               |
| PARTIES               | Juvonta Lafond v. FCI Beckley Warden                                                                                                                                                                                                                                          |

TOPICS

- federal habeas corpus
- post-conviction relief
- civil procedure

PRACTICE AREAS

## QUESTIONS PRESENTED

1. Whether the district court should review the magistrate judge's PF&R de novo when no objections were filed.
2. Whether Lafond's § 2241 habeas petition should be dismissed as moot following his release from custody.

## HOLDINGS

1. When no timely objections are filed to a magistrate judge's proposed findings and recommendation, the district court need not conduct de novo review of the unobjected-to factual or legal conclusions, and the party waives the right to appellate review of those conclusions.
2. A § 2241 habeas petition seeking relief from custody is moot when the petitioner has been released from custody and no live controversy remains.
3. A district court need not conduct de novo review when objections to a magistrate judge's PF&R are general and conclusory and fail to direct the court to a specific error.

## KEY QUOTATIONS

*“Failure to file timely objections constitutes a waiver of de novo review and the Petitioner’s right to appeal the Court’s order.”*

*“Accordingly, the Court ADOPTS the PF&R [Doc. 10], DISMISSES AS MOOT Mr. Lafond’s § 2241 Petition [Doc. 1], and REMOVES this matter from the docket.”*

## FACTUAL BACKGROUND

Lafond filed a federal habeas petition under § 2241 while in custody. He was released from custody before disposition of the petition, rendering the requested habeas relief moot. Lafond filed no objections to the magistrate judge's PF&R.

## PROCEDURAL HISTORY

Lafond filed a § 2241 petition on November 6, 2023. The matter was referred to Magistrate Judge Omar J. Aboulhosn, who issued a PF&R on January 5, 2026, recommending dismissal as moot because Lafond had been released from custody. No objections were filed by the January 22, 2026 deadline, and the district court adopted the PF&R, dismissed the petition as moot, and removed the matter from the docket.

## DISPOSITION

dismissed

## CASES CITED

- Thomas v. Arn, 474 U.S. 140 (1985)
- United States v. De Leon-Ramirez, 925 F.3d 177, 181 (4th Cir. 2019)
- Snyder v. Ridenour, 889 F.2d 1363, 1366 (4th Cir. 1989)
- Orpiano v. Johnson, 687 F.2d 44, 47 (4th Cir. 1982)

## OPINION

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF WEST VIRGINIA AT BECKLEY JUVONTA LAFOND, Petitioner, v. CIVIL ACTION NO. 5:23-cv-00718 FCI BECKLEY WARDEN, Respondent. ORDER Pending is Petitioner Juvonta Lafond's Petition for a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241 [Doc. 1], filed November 6, 2023. This action was previously referred to the Honorable Omar J. Aboulhosn, United States Magistrate Judge, for submission of proposed findings and a recommendation ("PF&R").

Magistrate Judge Aboulhosn filed his PF&R on January 5, 2026. Magistrate Judge Aboulhosn recommended that the Court dismiss as moot Mr. Lafond's § 2241 Petition given his release from custody and remove this matter from the docket.

The Court need not review, under a de novo or any other standard, the factual or legal conclusions of the magistrate judge as to those portions of the findings or recommendation to which no objections are addressed. See Thomas v. Arn, 474 U.S. 140 (1985); see also 28 U.S.C. § 636(b)(1) ("A judge of the court shall make a de novo determination of those portions of the report or specified proposed findings or recommendations to which objection is made." (emphasis added)).

Failure to file timely objections constitutes a waiver of de novo review and the Petitioner's right to appeal the Court's order. See 28 U.S.C. § 636(b)(1); see also United States v. De Leon- Ramirez, 925 F.3d 177, 181 (4th Cir. 2019) (Parties may not typically "appeal a magistrate judge's findings that were not objected to below, as § 636(b) doesn't require de novo review absent objection."); Snyder v. Ridenour, 889 F.2d 1363, 1366 (4th Cir.

1989). Further, the Court need not conduct de novo review when a party "makes general and conclusory objections that do not direct the Court to a specific error in the magistrate's proposed findings and recommendations." Orpiano v. Johnson, 687 F.2d 44, 47 (4th Cir. 1982). Objections in this case were due on January 22, 2026. No objections were filed.

Accordingly, the Court ADOPTS the PF&R [Doc. 10], DISMISSES AS MOOT Mr. Lafond's § 2241 Petition [Doc. 1], and REMOVES this matter from the docket. The Court directs the Clerk to transmit a copy of this Order to any counsel of record and any unrepresented party. ENTER: January 28, 2026 ©: W. Volk "Tae Chief United States District Judge