

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
MISSISSIPPI, NORTHERN DIVISION

Erick B. Coleman v. The State of Mississippi, et al.

Coleman · No. 3:25-CV-663-KHJ-MTP · Decided January 6, 2026

SUMMARY

The United States District Court for the Southern District of Mississippi adopts a magistrate judge’s report and recommendation and remands Erick B. Coleman’s removed state criminal case to the Leake County Justice Court. The court concludes that the constitutional and statutory provisions cited by Coleman do not establish federal jurisdiction and notes that he filed no objections to the report and recommendation.

CASE DETAILS

COURT	United States District Court for the Southern District of Mississippi, Northern Division
WRITING FOR THE COURT	Kristi H. Johnson
JURISDICTION	United States District Court for the Southern District of Mississippi, Northern Division
DECIDED	January 6, 2026
DOCKET	3:25-CV-663-KHJ-MTP
DISPOSITION	remanded
PROCEDURAL POSTURE	The district court reviewed a magistrate judge's unobjected-to report and recommendation recommending remand of a removed state criminal case to state court.
STANDARD OF REVIEW	When no party objects to a magistrate judge's report and recommendation, the district court need not conduct de novo review and may apply the clearly erroneous, abuse of discretion, and contrary-to-law standards.
PRECEDENTIAL VALUE	unpublished district court order

TOPICS

- subject matter jurisdiction
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the federal district court had jurisdiction over Coleman's removed state criminal case under Article III, Section 2, 28 U.S.C. § 1331, § 1443(1), or § 1446(d).
2. Whether the magistrate judge's recommendation to remand the action to state court was clearly erroneous, an abuse of discretion, or contrary to law.

HOLDINGS

1. Article III, Section 2, 28 U.S.C. § 1331, 28 U.S.C. § 1443(1), and 28 U.S.C. § 1446(d) did not provide a basis for federal jurisdiction over Coleman's state criminal case.
2. When no party objects to a magistrate judge's report and recommendation, the district court need not review the report de novo and may apply the clearly erroneous, abuse of discretion, and contrary-to-law standards.

KEY QUOTATIONS

“Finding the [13] Report neither clearly erroneous, an abuse of discretion, nor contrary to law, the Court ADOPTS the [13] Report as its opinion and REMANDS this action to the Leake County Justice Court.” (at 2)

FACTUAL BACKGROUND

Coleman alleged that he pleaded guilty in the Leake County Justice Court to disorderly conduct and operating a vehicle without a driver's license. He claimed that the justice court judge forced him into the plea agreement through threat, duress, and coercion. Coleman removed the criminal case to federal district court and asserted jurisdiction under Article III, Section 2, 28 U.S.C. §§ 1331, 1443(1), and 1446(d).

PROCEDURAL HISTORY

Erick B. Coleman removed his Leake County Justice Court criminal case to the Southern District of Mississippi, alleging that his guilty plea was coerced and asserting federal jurisdiction under Article III and several federal statutes. Magistrate Judge Michael T. Parker recommended remand to the Leake County Justice Court. Coleman did not file objections within the prescribed period, so the district court reviewed the report under the clearly erroneous, abuse of discretion, and contrary-to-law standards, adopted it, and remanded the action.

DISPOSITION

remanded

REMAND INSTRUCTIONS

The action is remanded to the Leake County Justice Court.

CASES CITED

- United States v. Wilson, 864 F.2d 1219, 1221 (5th Cir. 1989)

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