

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

Supreme Born v. Karen Williams

Born · No. 2:24-cv-1761-AMM-GMB · Decided March 2, 2026

SUMMARY

The United States District Court for the Northern District of Alabama adopted the Magistrate Judge’s recommendation and dismissed Supreme Born’s federal habeas corpus petition with prejudice as untimely. The court rejected Born’s arguments concerning the limitation-period trigger, statutory and equitable tolling, actual innocence, COVID-19 restrictions, and other constitutional claims, and denied a certificate of appealability.

CASE DETAILS

COURT	United States District Court for the Northern District of Alabama, Southern Division
JURISDICTION	United States District Court for the Northern District of Alabama, Southern Division
DECIDED	March 2, 2026
DOCKET	2:24-cv-1761-AMM-GMB
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner objected to a magistrate judge's report and recommendation recommending dismissal with prejudice of his 28 U.S.C. § 2254 petition as untimely.
STANDARD OF REVIEW	The district court reviewed the magistrate judge's report and recommendation and the petitioner's objections, adopted the report, and independently determined that the petition was untimely. A certificate of appealability requires a substantial showing of the denial of a constitutional right, including that reasonable jurists could debate the district court's assessment.
PRECEDENTIAL VALUE	Unknown; district court memorandum opinion with no reporter citation or stated precedential designation.
PARTIES	Supreme Born v. Karen Williams

TOPICS

federal habeas corpus

statute of limitations

post-conviction relief

actual innocence

appellate procedure

PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the federal habeas petition was timely under the one-year limitation period in 28 U.S.C. § 2244(d)(1).
2. Whether § 2244(d)(1)(D), rather than § 2244(d)(1)(A), supplied the applicable trigger date for the limitation period.
3. Whether Born's arguments for statutory or equitable tolling, actual innocence, and COVID-19-related filing restrictions avoided dismissal as untimely.
4. Whether Born was entitled to a certificate of appealability.

HOLDINGS

1. The one-year limitation period was triggered under 28 U.S.C. § 2244(d)(1)(A), beginning when Born's conviction became final through the conclusion of direct review or expiration of the time for seeking direct review, rather than under § 2244(d)(1)(D).
2. Born's federal habeas petition was untimely and had to be dismissed with prejudice, notwithstanding his arguments for statutory tolling, equitable tolling, actual innocence, and COVID-19-related filing restrictions.
3. A certificate of appealability was denied because Born did not make a substantial showing of the denial of a constitutional right.

KEY QUOTATIONS

“the limitation period began to run on the date Mr. Born’s convictions became final by the conclusion of direct review or the expiration of time for seeking direct review.” (at 2)

“This court may issue a certificate of appealability “only if the applicant has made a substantial showing of the denial of a constitutional right.”” (at 3)

FACTUAL BACKGROUND

Born was convicted in Alabama state court, and the Alabama Court of Criminal Appeals affirmed his sentence on December 11, 2020, after a second remand. The Alabama court overruled his application for rehearing on January 29, 2021, and Born did not petition the Alabama Supreme Court for certiorari within the applicable fourteen-day period. In his federal habeas petition and objections, Born asserted jurisdictional defects, ineffective assistance, suppression of exculpatory evidence, fabricated evidence, actual innocence, and pandemic-related filing restrictions.

PROCEDURAL HISTORY

The magistrate judge recommended dismissal with prejudice because the federal habeas petition was filed outside the applicable one-year limitation period, even after considering statutory and equitable tolling. Born filed objections reiterating his claims and arguing that a different limitations-period trigger applied. The district court adopted the report and recommendation, accepted the recommendation, dismissed the petition with prejudice, and declined to issue a certificate of appealability.

DISPOSITION

dismissed

CASES CITED

- Gonzalez v. Thaler, 565 U.S. 134, 137 (2012)
- Pugh v. Smith, 465 F.3d 1295, 1299-1300 (11th Cir. 2006)
- Slack v. McDaniel, 529 U.S. 473, 484 (2000)
- Miller-El v. Cockrell, 537 U.S. 322, 336 (2003)