

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
WEST VIRGINIA

Young v. FCI Beckley Warden

No. 5:24-cv-00498 (S.D.W. Va. June 15, 2026) · No. 5:24-cv-00498 · Decided June 15, 2026

SUMMARY

The United States District Court for the Southern District of West Virginia overruled Tyrone Young’s objections to a magistrate judge’s proposed findings and recommendations concerning his 28 U.S.C. § 2241 petition. The court held that the respondent’s failure to file a reply did not concede the merits, declined to resolve the exhaustion dispute because the claims failed on the merits, and concluded that Loper Bright did not alter the analysis of the Bureau of Prisons’ application of First Step Act earned-time-credit provisions. The court adopted the proposed findings and recommendations, denied the petition, and removed the matter 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	June 15, 2026
DOCKET	5:24-cv-00498
DISPOSITION	dismissed
PROCEDURAL POSTURE	District-court review of a magistrate judge's proposed findings and recommendations concerning a pro se petition for a writ of habeas corpus under 28 U.S.C. § 2241. The court reviewed the petitioner's specific objections de novo, overruled them, adopted the PF&R, denied the petition, and removed the case from the docket.
STANDARD OF REVIEW	Specific objections to a magistrate judge's proposed findings and recommendations are reviewed de novo under 28 U.S.C. § 636(b)(1). General or conclusory objections do not require de novo review and may waive appellate review. The Rule 12 dismissal analysis accepts well-pleaded allegations as true and draws reasonable factual inferences in the petitioner's favor, but does not accept unwarranted inferences, unreasonable conclusions, arguments, or allegations contradicted by judicially noticeable matters or exhibits.

PRECEDENTIAL VALUE	Unknown; district-court memorandum opinion and order.
PARTIES	Tyrone Young v. FCI Beckley Warden

TOPICS

federal habeas corpus exhaustion of remedies administrative law statutory interpretation
judicial review of agency action

PRACTICE AREAS

Federal habeas corpus Administrative law Statutory interpretation Federal civil procedure

QUESTIONS PRESENTED

1. Whether the respondent's failure to file a reply to Young's response required the court to treat Young's allegations as admitted or conceded.
2. Whether the court could resolve the petition without deciding the disputed exhaustion issue because the claims failed on the merits.
3. Whether the First Step Act unambiguously limits application of earned time credits toward prerelease custody or supervised release to prisoners who demonstrate recidivism-risk reduction or maintain a minimum or low recidivism risk.
4. Whether *Loper Bright Enterprises v. Raimondo* applies to Young's challenge to the BOP's PATTERN-based eligibility restrictions and related regulations.
5. Whether the BOP's determination of an inmate's PATTERN score is subject to judicial review under 18 U.S.C. § 3625.

HOLDINGS

1. A respondent's failure to file a reply pleading, absent a court-ordered reply requirement, does not concede the merits of the petitioner's claims or require acceptance of all allegations as true.
2. The court need not resolve a disputed exhaustion issue when the petitioner's claims independently fail on the merits.
3. The First Step Act unambiguously restricts application of earned time credits toward prerelease custody or supervised release to inmates who demonstrate recidivism-risk reduction or maintain a minimum or low recidivism risk.
4. The BOP's determination of an inmate's PATTERN score is not subject to judicial review under 18 U.S.C. § 3625.
5. *Loper Bright* does not apply where the challenged BOP regulation mirrors an unambiguous statutory eligibility restriction rather than reflecting an agency interpretation of statutory ambiguity.

KEY QUOTATIONS

“Under Rule 7(a), while reply pleadings are permitted if ordered by the court, a failure to reply does not amount to a concession on the merits of a petitioner’s claims.” (Opinion § III.A)

“Simply put, even assuming Mr. Young properly exhausted all his claims as he suggests, his claims yet fail on the merits for those reasons set forth in detail in the PF&R.” (Opinion § III.B)

“Inasmuch as the statute unambiguously restricts the application of earned time credits toward pre-release custody or supervised release to inmates with low or minimum recidivism risk scores, the Magistrate Judge did not err in concluding Loper Bright is inapplicable.” (Opinion § III.C)

FACTUAL BACKGROUND

Young, a federal inmate, challenged the BOP's use of PATTERN recidivism scores and violent-history points in determining whether he could apply earned time credits under the First Step Act. He contended that BOP regulations, including 28 C.F.R. § 523.44(b), improperly prevented inmates with medium or high recidivism-risk scores from applying credits toward prerelease custody or supervised release. The record also included disputes concerning whether Young had exhausted administrative remedies and whether the respondent had filed a reply to Young's response.

PROCEDURAL HISTORY

Young filed a § 2241 petition challenging Bureau of Prisons regulations and practices concerning First Step Act earned-time credits, PATTERN scores, and violent-history points. Magistrate Judge Reeder recommended dismissal after addressing exhaustion and the merits. Young timely objected, asserting that the respondent's failure to file a reply required acceptance of his allegations, that he had exhausted his administrative remedies, and that Loper Bright permitted review of the BOP's interpretation. The district court rejected those objections, adopted the PF&R, denied the petition, and ordered the case removed from the docket.

DISPOSITION

dismissed

CASES CITED

- Page v. Lee, 337 F.3d 411, 416 n.3 (4th Cir. 2003)
- Howard v. Secretary of Health & Human Services, 932 F.2d 505, 508-09 (6th Cir. 1991)
- Lockert v. Faulkner, 843 F.2d 1015, 1019 (7th Cir. 1988)
- Orpiano v. Johnson, 687 F.2d 44, 47 (4th Cir. 1982)
- Elijah v. Dunbar, 66 F.4th 454, 461 (4th Cir. 2023)
- Loper Bright Enterprises v. Raimondo, 603 U.S. 369 (2024)
- Purdy v. Carter, No. CV BAH-24-582, 2024 WL 4651275, at *5 (D. Md. Nov. 1, 2024)
- Jones v. Joseph, No. 9:24-cv-01474-JDA-MHC, 2024 WL 5340423, at *8 (D.S.C. Dec. 19, 2024)

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