

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

Donta Jermaine West v. Sheriff Eddie Hawkins

West v. Hawkins · No. 1:25CV96-GHD-DAS · Decided January 5, 2026

SUMMARY

The United States District Court for the Northern District of Mississippi addresses Donta Jermaine West’s pro se habeas petition, construed under 28 U.S.C. § 2241, challenging his pretrial detention and related state-court proceedings. The court concludes that West’s guilty plea and resulting conviction rendered his pretrial detention claims moot, and that any claims challenging his conviction or sentence were unexhausted under 28 U.S.C. § 2254. The petition is dismissed without prejudice, and related motions are resolved as described in the opinion.

CASE DETAILS

COURT	United States District Court for the Northern District of Mississippi, Aberdeen Division
JURISDICTION	United States District Court for the Northern District of Mississippi, Aberdeen Division
DECIDED	January 5, 2026
DOCKET	1:25CV96-GHD-DAS
DISPOSITION	dismissed
PROCEDURAL POSTURE	West filed a federal habeas petition challenging his pretrial detention and related state-court proceedings. The State moved to dismiss, and the court dismissed the petition without prejudice as moot and, alternatively, for failure to exhaust state remedies.
STANDARD OF REVIEW	The court examined subject-matter jurisdiction under Article III, the mootness of the habeas claims, the cognizability of pretrial habeas claims, and the exhaustion requirement for any claims construed under 28 U.S.C. § 2254.
PRECEDENTIAL VALUE	Unknown; memorandum opinion from a federal district court, with no published reporter citation.
PARTIES	Donta Jermaine West v. Sheriff Eddie Hawkins

TOPICS

federal habeas corpus

habeas corpus

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due process

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PRACTICE AREAS

Federal habeas corpus

Criminal procedure

Post-conviction relief

Federal civil procedure

QUESTIONS PRESENTED

1. Whether West's § 2241 challenge to his pretrial detention remained a live controversy after he pleaded guilty, was sentenced, and obtained dismissal of the remaining charge.
2. Whether any claims construed as challenges to West's conviction or sentence under 28 U.S.C. § 2254 could proceed without exhaustion of available state remedies.
3. Whether West's post-dismissal motions to amend should be allowed.
4. Whether West was entitled to default judgment or summary judgment.

HOLDINGS

1. West's challenge to his pretrial detention became moot when the underlying charges were resolved through his guilty plea, sentencing, and dismissal of the remaining charge; the court therefore lacked subject-matter jurisdiction over the pretrial detention claims.
2. To the extent West's filings challenged his conviction or sentence under § 2254, the claims were subject to dismissal without prejudice for failure to exhaust available state remedies.
3. West's guilty plea waived independent claims concerning alleged constitutional or procedural violations that occurred before entry of the plea, other than jurisdictional defects.
4. Money damages are not cognizable through a habeas corpus proceeding.

KEY QUOTATIONS

“In order to maintain jurisdiction, the court must have before it an actual case or controversy at all stages of the judicial proceedings.” (at 9)

“A case becomes moot only when it is impossible for a court to grant any effectual relief whatever to the prevailing party.” (at 9)

“When a criminal defendant has solemnly admitted in open court that he is in fact guilty of the offense with which he is charged, he may not thereafter raise independent claims relating to the deprivation of constitutional rights that occurred prior to the entry of the guilty plea.” (at 12)

FACTUAL BACKGROUND

West challenged his pretrial detention and alleged due-process violations involving arraignment, a preliminary hearing, the opportunity to be heard and cross-examine witnesses, and the state speedy-trial rule. While the federal petition was pending, he pleaded guilty to possession of methamphetamine with intent to distribute, received a twenty-year sentence, and obtained dismissal of the separate possession charge. He was therefore incarcerated under a criminal judgment rather than under the pretrial detention challenged in his petition.

PROCEDURAL HISTORY

West initially filed a pleading under 28 U.S.C. § 2254 while detained before trial. The court construed the filings as arising under 28 U.S.C. § 2241 because West was a pretrial detainee. While the federal case was pending, West pleaded guilty in state court, received a twenty-year sentence, and obtained dismissal of the other charge. The court granted one motion to amend, denied later motions to amend, denied default judgment, and dismissed the habeas petition.

DISPOSITION

dismissed

CASES CITED

- Duker, *The English Origins of the Writ of Habeas Corpus: A Peculiar Path to Fame*, 53 N.Y.U. L. Rev. 983 (1978)
- Glass, *Historical Aspects of Habeas Corpus*, 9 St. John's L. Rev. 55 (1934)
- *Secretary of State for Home Affairs v. O'Brien*, A.C. 603, 609 (1923)
- *Frank v. Mangum*, 237 U.S. 309, 311 (1915)
- *Preiser v. Rodriguez*, 411 U.S. 475, 484 (1973)
- *Herndon v. Upton*, 985 F.3d 443, 446 (5th Cir. 2021)
- *Spencer v. Kemna*, 523 U.S. 1, 7 (1998)
- *Adair v. Dretke*, 150 F. App'x 329, 331 (5th Cir. 2005)
- *Knox v. Service Employees International Union, Local 1000*, 567 U.S. 298, 307 (2012)
- *Salgado v. Federal Bureau of Prisons*, 220 F. App'x 256, 257 (5th Cir. 2007)
- *Dailey v. Vought Aircraft Co.*, 141 F.3d 224, 227 (5th Cir. 1998)
- *McBride v. Lumpkin*, 2022 WL 1800842, at *2 (5th Cir. June 2, 2022)
- *Salcido v. Wilson*, No. 21-11029, 2022 WL 1564188, at *1 (5th Cir. May 18, 2022)
- *Cinel v. Connick*, 15 F.3d 1338, 1341 (5th Cir. 1994)
- *Hitt v. City of Pasadena*, 561 F.2d 606, 608 (5th Cir. 1977)
- *Brown v. Estelle*, 530 F.2d 1280, 1283 (5th Cir. 1976)
- *Dickerson v. State of Louisiana*, 816 F.2d 220, 224-26 (5th Cir. 1987)
- *Fassler v. United States*, 858 F.2d 1016, 1018 (5th Cir. 1988)
- *Yohey v. Collins*, 985 F.2d 222, 228-29 (5th Cir. 1993)
- *Hartfield v. Osborne*, 808 F.3d 1066 (5th Cir. 2015)
- *Clark v. Hubbard*, No. 1:21-CV-228-TBM-RPM, 2022 WL 3575289, at *2-*4 (S.D. Miss. Mar. 4, 2022)
- *Fogleman v. Hubbard*, No. 1:20-CV-12-HWO-RPM, 2021 WL 1608246, at *2-*4 (S.D. Miss. Jan. 15, 2021)
- *Wade v. Wichita County, Texas*, No. 21-10283, 2021 WL 5751441, at *1 (5th Cir. Dec. 2, 2021)
- *Martinez v. Atkinson*, 678 F. App'x 218, 219 (5th Cir. 2017)
- *Nelson v. Hargett*, 989 F.2d 847, 850 (5th Cir. 1993)

- Tollett v. Henderson, 411 U.S. 258, 267 (1973)
- Davila v. Davis, 582 U.S. 521, 528 (2017)
- Fisher v. Texas, 169 F.3d 295, 302 (5th Cir. 1999)
- O'Sullivan v. Boerckel, 526 U.S. 838, 845 (1999)
- Carter v. Estelle, 677 F.2d 427, 442-44 (5th Cir. 1982)
- Dupuy v. Butler, 837 F.2d 699, 702 (5th Cir. 1988)
- Gregory v. Mitchell, 634 F.2d 199, 203 (5th Cir. 1981)

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