

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF  
OKLAHOMA

James R. Blanchard v. Garfield Co. Court et al.

Blanchard · No. CIV-24-450-G · Decided March 10, 2026

SUMMARY

The United States District Court for the Western District of Oklahoma overruled Plaintiff James R. Blanchard’s objection to a magistrate judge’s Report and Recommendation. The court adopted the recommendation, dismissed the prisoner’s civil rights complaint without prejudice under 28 U.S.C. § 1915A based on immunity and Heck v. Humphrey, and denied subsequent motions as moot.

CASE DETAILS

|                       |                                                                                                                                                                                         |
|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Western District of Oklahoma                                                                                                                       |
| WRITING FOR THE COURT | Vaal B. Kodo                                                                                                                                                                            |
| JURISDICTION          | United States District Court for the Western District of Oklahoma                                                                                                                       |
| DECIDED               | March 10, 2026                                                                                                                                                                          |
| DOCKET                | CIV-24-450-G                                                                                                                                                                            |
| DISPOSITION           | dismissed                                                                                                                                                                               |
| PROCEDURAL POSTURE    | A pro se state prisoner objected to a magistrate judge's Report and Recommendation recommending dismissal of his civil-rights complaint at screening under 28 U.S.C. § 1915A.           |
| STANDARD OF REVIEW    | De novo review of the portions of the Report and Recommendation to which specific objections were made, pursuant to 28 U.S.C. § 636(b)(1) and Federal Rule of Civil Procedure 72(b)(3). |
| PRECEDENTIAL VALUE    | Unknown; unpublished district court order                                                                                                                                               |
| PARTIES               | James R. Blanchard v. Garfield Co. Court et al.                                                                                                                                         |

TOPICS

- prisoners rights
- section 1983
- civil rights
- post-conviction relief
- civil procedure

PRACTICE AREAS

- Civil rights
- Prisoner civil rights
- Federal civil procedure

## QUESTIONS PRESENTED

1. Whether the plaintiff's specific objections demonstrated error in the magistrate judge's findings that two defendants were immune.
2. Whether the plaintiff's remaining civil-rights claims were barred by Heck v. Humphrey and failed to plausibly state a claim for relief under 28 U.S.C. § 1915A.
3. Whether the Report and Recommendation should be adopted and the complaint dismissed without prejudice.

## HOLDINGS

1. The plaintiff's objections did not establish error in the magistrate judge's findings that two named defendants were entitled to immunity.
2. The plaintiff's remaining claims were barred by Heck v. Humphrey, and the complaint failed to plausibly plead a claim for relief; dismissal on screening was therefore proper.
3. The Report and Recommendation was adopted in its entirety, the complaint was dismissed without prejudice, and the plaintiff's subsequent motions were denied as moot.

## KEY QUOTATIONS

*"The Complaint (Doc. No. 1) is DISMISSED without prejudice."* (Conclusion)

## FACTUAL BACKGROUND

James R. Blanchard, a state prisoner proceeding pro se, brought a federal civil-rights action against Garfield County Court and other defendants. His claims arose from alleged errors by state courts in his prior efforts to obtain relief. On screening, the magistrate judge determined that two defendants were immune and that the remaining claims were barred by Heck v. Humphrey because they failed to plausibly state a claim for relief in the federal action.

## PROCEDURAL HISTORY

Plaintiff initiated the federal civil-rights action on May 3, 2024. The matter was referred to Magistrate Judge Suzanne Mitchell, who recommended dismissal on November 21, 2024, concluding that two defendants were immune and that the remaining claims were barred by Heck v. Humphrey. The district court reviewed the specific objections de novo, overruled them, adopted the Report and Recommendation in its entirety, dismissed the complaint without prejudice, and denied subsequent motions as moot.

## DISPOSITION

dismissed

## CASES CITED

- Heck v. Humphrey, 512 U.S. 477 (1994)
- United States v. 2121 E. 30th St., 73 F.3d 1057, 1060 (10th Cir. 1996)

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