

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH
CAROLINA, ROCK HILL DIVISION

Phillip Reeves v. Scotty Bodiford

Reeves · No. 0:26-114-CMC · Decided March 25, 2026

SUMMARY

The United States District Court for the District of South Carolina adopts a magistrate judge’s recommendation and dismisses Phillip Reeves’s 28 U.S.C. § 2241 habeas petition without prejudice and without requiring a response from the respondent. The court concludes that the petition is duplicative and subject to Younger abstention, and that the petitioner’s Gerstein argument does not apply because he was indicted by a grand jury and arrested pursuant to warrants.

CASE DETAILS

COURT	United States District Court for the District of South Carolina, Rock Hill Division
WRITING FOR THE COURT	Cameron McGowan Currie
JURISDICTION	United States District Court for the District of South Carolina, Rock Hill Division
DECIDED	March 25, 2026
DOCKET	0:26-114-CMC
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner sought federal habeas relief under 28 U.S.C. § 2241 while state criminal proceedings were ongoing. The matter was referred to a magistrate judge, who recommended dismissal without prejudice without requiring a response from the respondent. After reviewing Petitioner's objections, the district court adopted the recommendation and dismissed the petition.
STANDARD OF REVIEW	The district court conducts de novo review of portions of a magistrate judge's report to which specific objections are made. In the absence of a timely specific objection, the court reviews the report for clear error on the face of the record.
PRECEDENTIAL VALUE	Nonprecedential district court order
PARTIES	Phillip Reeves v. Scotty Bodiford

TOPICS

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PRACTICE AREAS

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Criminal procedure

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QUESTIONS PRESENTED

1. Whether the federal § 2241 petition should be dismissed as duplicative and under the Younger abstention doctrine while Petitioner's state criminal proceedings remained ongoing.
2. Whether Gerstein v. Pugh permitted federal relief concerning a preliminary hearing or pretrial detention despite Petitioner's indictment and arrest pursuant to warrants.
3. Whether Petitioner could challenge the sufficiency of the warrants or indictment in the ongoing state criminal proceeding.

HOLDINGS

1. The petition was properly dismissed without prejudice because it was duplicative and implicated ongoing state criminal proceedings subject to Younger abstention.
2. Gerstein's exception concerning pretrial detention without a judicial probable-cause hearing did not apply where Petitioner had been indicted by a grand jury and arrested pursuant to warrants.
3. Petitioner could challenge the sufficiency of the warrants or indictment in the state criminal action.

KEY QUOTATIONS

“in the absence of a timely filed objection, a district court need not conduct a de novo review, but instead must only satisfy itself that there is no clear error on the face of the record in order to accept the recommendation.” (at 2)

“Further, the court agrees Petitioner may challenge the sufficiency of the warrants or indictment in his state criminal action.” (at 3)

FACTUAL BACKGROUND

Petitioner was subject to ongoing state criminal proceedings. He had been indicted by a grand jury and arrested pursuant to warrants, and he challenged the legality of his incarceration, the sufficiency of the warrants or indictment, and alleged fabrication of evidence through perjured testimony or omission of material evidence. The federal petition concerned an asserted September 18, 2024 arrest, while Petitioner distinguished it from an August 15, 2024 arrest addressed in an earlier case.

PROCEDURAL HISTORY

Reeves filed a pro se § 2241 habeas petition. Magistrate Judge Paige J. Gossett issued a Report and Recommendation recommending dismissal because the action was duplicative and abstention was required under Younger v. Harris and its progeny. Reeves filed objections, asserting a Fourteenth Amendment fabrication-

of-evidence claim and relying on *Gerstein v. Pugh*. The district court reviewed the objections, agreed with the magistrate judge, adopted the Report, and dismissed the petition without prejudice.

DISPOSITION

dismissed

CASES CITED

- *Mathews v. Weber*, 423 U.S. 261 (1976)
- *Diamond v. Colonial Life & Accident Insurance Co.*, 416 F.3d 310, 315 (4th Cir. 2005)
- *Younger v. Harris*, 401 U.S. 37 (1971)
- *Gerstein v. Pugh*, 420 U.S. 103, 108 n.9, 116-117 (1975)

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