

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WASHINGTON

Ryan Scott Adams v. State of Washington

Adams · No. 3:25-CV-5659-BHS-DWC · Decided January 14, 2026

SUMMARY

The United States District Court for the Western District of Washington declines a magistrate judge’s voluntary recusal in Ryan Scott Adams’s 28 U.S.C. § 2254 action. The court concludes that the petitioner’s cited rulings and alleged conduct do not establish a reasonable basis to question the judge’s impartiality, refers the recusal motion to the chief judge, and re-notes several motions for February 13, 2026.

CASE DETAILS

COURT	United States District Court for the Western District of Washington
WRITING FOR THE COURT	David W. Christel
JURISDICTION	United States District Court for the Western District of Washington
DECIDED	January 14, 2026
DOCKET	3:25-CV-5659-BHS-DWC
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner in a 28 U.S.C. § 2254 habeas action moved for the assigned magistrate judge's recusal. The magistrate judge declined to recuse voluntarily and referred the motion to the chief judge under Local Civil Rule 3(f).
STANDARD OF REVIEW	Objective recusal standard: whether a reasonable person with knowledge of all the facts would conclude that the judge's impartiality might reasonably be questioned.
PRECEDENTIAL VALUE	Unknown; district court order with no reported citation
PARTIES	Ryan Scott Adams v. State of Washington

TOPICS

- federal habeas corpus
- civil procedure
- discovery dispute

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the magistrate judge was required to recuse under 28 U.S.C. §§ 144 or 455 based on prior judicial rulings and alleged predisposition.
2. Whether the magistrate judge should voluntarily recuse under Local Civil Rule 3(f).

HOLDINGS

1. Prior judicial rulings, including rulings adverse to the petitioner in the present or a separate case, did not establish a reasonable basis to question the magistrate judge's impartiality or require recusal.
2. The denial of habeas discovery did not support recusal because habeas petitioners do not have a presumptive entitlement to discovery and the court had not found good cause for discovery at that stage.

KEY QUOTATIONS

“[J]udicial rulings alone almost never constitute a valid basis for a bias or partiality motion. . . . [O]pinions formed by the judge on the basis of facts introduced or events occurring in the course of the current proceedings, or of prior proceedings, do not constitute a basis for a bias or partiality motion unless they display a deep seated favoritism or antagonism that would make fair judgment impossible.” (at 2)

“Under both 28 U.S.C. §144 and 28 U.S.C. § 455, recusal of a federal judge is appropriate if “a reasonable person with knowledge of all the facts would conclude that the judge’s impartiality might reasonably be questioned.”” (at 1)

FACTUAL BACKGROUND

Petitioner sought recusal after the magistrate judge granted extensions of time, informed petitioner that reconsideration could be sought as to those extension rulings, denied a discovery request, and had ruled against petitioner in a separate case. The court concluded that these rulings did not demonstrate predisposition, personal bias, or partiality, and that petitioner had not shown a reasonable basis to question the court's impartiality.

PROCEDURAL HISTORY

The district court referred the habeas action to Magistrate Judge David W. Christel. Petitioner moved for recusal based on the judge's rulings concerning extensions of time, discovery, and a separate case. After reviewing the motion and record, the magistrate judge found no reasonable basis for voluntary recusal, referred the recusal motion and order to Chief Judge Estudillo, and re-noted other pending motions and the response to the petition.

DISPOSITION

other

CASES CITED

- Yagman v. Republic Insurance, 987 F.2d 622, 626 (9th Cir. 1993)

- Preston v. United States, 923 F.2d 731, 734 (9th Cir. 1991)
- United States v. Conforte, 624 F.2d 869, 881 (9th Cir. 1980)
- Liteky v. United States, 510 U.S. 540, 555 (1994)
- Bracy v. Gramley, 520 U.S. 899, 903-05 (1997)
- Rich v. Calderon, 187 F.3d 1064, 1068 (9th Cir. 1999)

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