

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
WEST VIRGINIA

Deangelo Jackson v. FCI Beckley Warden

Jackson v. FCI Beckley Warden · No. 5:24-cv-00680 · Decided May 26, 2026

SUMMARY

The United States District Court for the Southern District of West Virginia adopts the magistrate judge’s proposed findings and recommendation and denies Deangelo Jackson’s petition for habeas corpus under 28 U.S.C. § 2241 as moot. The court dismisses the matter because Jackson was no longer in federal custody and filed no objections to the PF&R.

CASE DETAILS

COURT	United States District Court for the Southern District of West Virginia
WRITING FOR THE COURT	Frank W. Volk
JURISDICTION	United States District Court for the Southern District of West Virginia
DECIDED	May 26, 2026
DOCKET	5:24-cv-00680
DISPOSITION	dismissed
PROCEDURAL POSTURE	Review of a magistrate judge's proposed findings and recommendation in a federal habeas action under 28 U.S.C. § 2241. The magistrate judge recommended denying the petition as moot because Petitioner was no longer in federal custody; no objections were filed.
STANDARD OF REVIEW	De novo review is required only for those portions of a magistrate judge's proposed findings and recommendation to which a party makes specific objection. Absent objections, the district court need not conduct de novo review; general and conclusory objections likewise do not require de novo review.
PRECEDENTIAL VALUE	unpublished district court order; nonprecedential status not expressly stated in the opinion
PARTIES	Deangelo Jackson v. FCI Beckley Warden

TOPICS

- federal habeas corpus
- post-conviction relief
- civil procedure

PRACTICE AREAS

federal habeas corpus

post-conviction relief

civil procedure

QUESTIONS PRESENTED

1. Whether the district court was required to conduct de novo review of the magistrate judge's proposed findings and recommendation when no objections were filed.
2. Whether Jackson's § 2241 habeas petition was moot because he was no longer in federal custody.

HOLDINGS

1. The district court was not required to conduct de novo or other review of the magistrate judge's factual or legal conclusions because Jackson filed no objections to the proposed findings and recommendation.
2. The § 2241 petition was moot because Jackson was no longer in federal custody, and the action was dismissed.

KEY QUOTATIONS

"The Court need not review, under a de novo or any other standard, the factual or legal conclusions of the magistrate judge as to those portions of the findings or recommendation to which no objections are addressed." (Order at 1)

"Accordingly, the Court ADOPTS the PF&R [ECF 10], DENIES AS MOOT the Petition for a Writ of Habeas Corpus [ECF 1], and DISMISSES the matter." (Order at 1)

FACTUAL BACKGROUND

Jackson filed an emergency § 2241 habeas petition while apparently in federal custody. By the time the matter was adjudicated, Bureau of Prisons records indicated that Jackson had been released from custody on August 15, 2025. The proposed findings and recommendation therefore concluded that the petition was moot, and Jackson filed no objections.

PROCEDURAL HISTORY

Jackson filed an emergency petition for a writ of habeas corpus under 28 U.S.C. § 2241 on November 25, 2024. The matter was referred to Magistrate Judge Dwane L. Tinsley, who issued a proposed findings and recommendation on April 22, 2026, recommending denial as moot. After no objections were filed by the May 11, 2026 deadline, the district court adopted the recommendation, denied the petition as moot, and dismissed the action.

DISPOSITION

dismissed

CASES CITED

- Thomas v. Arn, 474 U.S. 140 (1985)

- United States v. De Leon-Ramirez, 925 F.3d 177, 181 (4th Cir. 2019)
- Snyder v. Ridenour, 889 F.2d 1363, 1366 (4th Cir. 1989)
- Orpiano v. Johnson, 687 F.2d 44, 47 (4th Cir. 1982)

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