

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
OHIO, WESTERN DIVISION AT CINCINNATI

Robert Boyd v. Warden, Madison Correctional Institution

Boyd · No. 1:25-cv-00455 · Decided November 25, 2025

SUMMARY

The United States District Court for the Southern District of Ohio denies Robert Boyd’s requests for production of documents in his 28 U.S.C. § 2254 habeas corpus case. The court explains that habeas discovery is governed by the Rules Governing § 2254 Proceedings, requires a showing of good cause and materiality, and is limited by Cullen v. Pinholster. The court grants Boyd’s motion for an extension of time to file his reply through December 15, 2025.

CASE DETAILS

COURT	United States District Court for the Southern District of Ohio, Western Division at Cincinnati
WRITING FOR THE COURT	Michael R. Merz
JURISDICTION	United States District Court for the Southern District of Ohio, Western Division at Cincinnati
DECIDED	November 25, 2025
DOCKET	1:25-cv-00455
DISPOSITION	other
PROCEDURAL POSTURE	Federal habeas corpus proceeding under 28 U.S.C. § 2254. The court considered the petitioner's motion for an extension of time and requests for production of documents.
STANDARD OF REVIEW	Discovery in a habeas proceeding is committed to the court's discretion and requires a fact-specific showing of good cause and materiality.
PRECEDENTIAL VALUE	unpublished
PARTIES	Robert Boyd v. Warden, Madison Correctional Institution

TOPICS

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

PRACTICE AREAS

federal habeas corpus

post-conviction relief

civil procedure

QUESTIONS PRESENTED

1. Whether Boyd was entitled to discovery under Rule 6 of the Rules Governing § 2254 Cases.
2. Whether Boyd had shown that the requested documents were material to resolution of his habeas claims.
3. Whether Boyd should receive an extension of time to file his reply or traverse.

HOLDINGS

1. A habeas petitioner is not entitled to discovery as a matter of course; discovery requires a fact-specific showing of good cause and materiality and remains within the court's discretion. Boyd failed to make that showing, so his requests for production of documents were denied.
2. In evaluating a claim under § 2254, a federal habeas court is generally limited to the record that was before the last state court to consider the claim, and may not use new evidence to assess the reasonableness of the state court's constitutional analysis.
3. Boyd was granted an extension of time through and including December 15, 2025, to file his reply or traverse.

KEY QUOTATIONS

“A habeas petitioner or § 2255 movant is not entitled to discovery as a matter of course, but only upon a fact-specific showing of good cause and in the Court’s exercise of discretion.” (2)

“Habeas corpus courts are limited to the record that was before the last state court to consider a case.” (2)

FACTUAL BACKGROUND

Boyd sought documents from Warden Hildebrand in connection with his pending federal habeas case. The court found it highly unlikely that the warden possessed the requested evidentiary materials and concluded that Boyd had not shown the documents were material to resolution of the case. The court also noted that federal habeas review is generally confined to the record before the last state court to consider the claim.

PROCEDURAL HISTORY

Robert Boyd, proceeding pro se, filed a § 2254 habeas corpus case. While the case was pending, he requested production of documents directed to the warden and moved for additional time to file a reply or traverse. The court denied the discovery requests and extended the reply deadline to December 15, 2025.

DISPOSITION

other

CASES CITED

- Bracy v. Gramley, 520 U.S. 899 (1997)
- Harris v. Nelson, 394 U.S. 286 (1969)
- Byrd v. Collins, 209 F.3d 486, 515-16 (6th Cir. 2000)
- United States v. Armstrong, 517 U.S. 456, 468 (1996)
- Stanford v. Parker, 266 F.3d 442, 460 (6th Cir. 2001), cert. denied, 537 U.S. 831 (2002)
- Murphy v. Johnson, 205 F.3d 809, 813-15 (5th Cir. 2000)
- Bowling v. Parker, 344 F.3d 487, 512 (6th Cir. 2003), cert. denied, 543 U.S. 842 (2004)
- Cullen v. Pinholster, 563 U.S. 170 (2011)
- Upshaw v. Stephenson, 97 F.4th 365, 372 (6th Cir. 2024)
- Mitchell v. Genovese, 974 F.3d 638, 647 (6th Cir. 2020)

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