

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
WEST VIRGINIA

Christopher Adam Jackson v. Curtis Dixon

Jackson v. Dixon · No. 5:25-cv-00480 · Decided June 3, 2026

SUMMARY

The United States District Court for the Southern District of West Virginia adopted a magistrate judge’s proposed findings and recommendation concerning Christopher Adam Jackson’s petition for habeas corpus under 28 U.S.C. § 2241. The court denied the petition and dismissed the action without prejudice for failure to prosecute under Federal Rule of Civil Procedure 41(b), after no objections were filed.

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	June 3, 2026
DOCKET	5:25-cv-00480
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner sought habeas relief under 28 U.S.C. § 2241. After referral, the magistrate judge recommended denial of the petition and dismissal without prejudice for failure to prosecute under Federal Rule of Civil Procedure 41(b). The district court adopted the PF&R, denied the petition, and dismissed the action without prejudice.
STANDARD OF REVIEW	The district court need not conduct de novo review of portions of a magistrate judge's PF&R to which no specific objection is made. General and conclusory objections also do not trigger de novo review. Failure to file timely objections waives de novo review and the right to appeal factual and legal conclusions not specifically challenged.
PRECEDENTIAL VALUE	Unknown
PARTIES	Christopher Adam Jackson v. Curtis Dixon

TOPICS

federal habeas corpus

post-conviction relief

civil procedure

PRACTICE AREAS

Habeas corpus

Federal civil procedure

Post-conviction relief

QUESTIONS PRESENTED

1. Whether the district court was required to conduct de novo review of the magistrate judge's PF&R when no objections were filed.
2. Whether the § 2241 petition should be denied and the action dismissed without prejudice for failure to prosecute under Federal Rule of Civil Procedure 41(b).

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 timely objections.
2. The § 2241 petition was denied, and the action was dismissed without prejudice for failure to prosecute under Federal Rule of Civil Procedure 41(b).

KEY QUOTATIONS

“Failure to file timely objections constitutes a waiver of de novo review and the Petitioner’s right to appeal the Court’s order.” (Order)

“Accordingly, the Court ADOPTS the PF&R [Doc. 8], DENIES Mr. Jackson’s § 2241 Petition for a Writ of Habeas Corpus [Doc. 1], DISMISSES this matter without prejudice for failure to prosecute under Rule 41(b), and REMOVES this matter from the docket.” (Order)

FACTUAL BACKGROUND

Jackson filed a petition for a writ of habeas corpus under § 2241. The PF&R was mailed to him at Southern Regional Jail, returned as undeliverable, and then remailed to his last provided address. No objections or response were received by the deadline, and the court concluded that the matter was ripe for adjudication.

PROCEDURAL HISTORY

Jackson filed a § 2241 petition on August 1, 2025. Magistrate Judge Joseph K. Reeder issued a PF&R on May 8, 2026, recommending denial and dismissal for failure to prosecute. No timely objections were filed; the district court adopted the PF&R and removed the matter from its docket.

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)

OPINION

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF WEST VIRGINIA AT BECKLEY CHRISTOPHER ADAM JACKSON, Petitioner, v. CIVIL ACTION NO. 5:25-cv-00480 CURTIS DIXON, Respondent. ORDER Pending is Petitioner Christopher Adam Jackson's Petition for a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241 [Doc. 1], filed August 1, 2025. This action was previously referred to the Honorable Joseph K. Reeder, United States Magistrate Judge, for submission of proposed findings and a recommendation ("PF&R").

Magistrate Judge Reeder filed his PF&R on May 8, 2026. Magistrate Judge Reeder recommended that the Court deny Mr. Jackson's § 2241 Petition and dismiss this matter without prejudice for failure to prosecute under Federal Rule of Civil Procedure 41(b).

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. See Thomas v. Arn, 474 U.S. 140 (1985); see also 28 U.S.C. § 636(b)(1) ("A judge of the court shall make a de novo determination of those portions of the report or specified proposed findings or recommendations to which objection is made." (emphasis added)).

Failure to file timely objections constitutes a waiver of de novo review and the Petitioner's right to appeal the Court's order. See 28 U.S.C. § 636(b)(1); see also United States v. De Leon-Ramirez, 925 F.3d 177, 181 (4th Cir. 2019) (Parties may not typically "appeal a magistrate judge's findings that were not objected to below, as § 636(b) doesn't require de novo review absent objection."); Snyder v. Ridenour, 889 F.2d 1363, 1366 (4th Cir.

1989). Further, the Court need not conduct de novo review when a party "makes general and conclusory objections that do not direct the Court to a specific error in the magistrate's proposed findings and recommendations." Orpiano v. Johnson, 687 F.2d 44, 47 (4th Cir. 1982). Objections in this case were due on May 26, 2026. No objections were filed.!

Accordingly, the Court ADOPTS the PF&R [Doc. 8], DENIES Mr. Jackson's § 2241 Petition for a Writ of Habeas Corpus [Doc. 1], DISMISSES this matter without prejudice for failure to prosecute under Rule 41(b), and REMOVES this matter from the docket.

The Court directs the Clerk to transmit a copy of this Order to any counsel of record and any unrepresented party. ENTER: June 3, 2026 ZINa Frank W. Volk "ame" Chief United States District

Judge ' On May 8, 2026, a copy of the PF&R was mailed to Mr. Jackson at Southern Regional Jail but was returned as undeliverable on May 19, 2026. [Doc. 9].

On May 19, 2026, the PF&R was subsequently remailed to Mr. Jackson at his last provided address. [/d.]. At this writing, no response has been received. The matter is thus ripe for adjudication.