

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF IDAHO

Rydon Clyde Teton v. United States of America

Teton · No. 4:24-cv-00376-DCN · Decided February 4, 2026

SUMMARY

The United States District Court for the District of Idaho denied Rydon Clyde Teton’s outstanding motions, finding them frivolous or otherwise lacking merit. The court also ordered Teton to show cause within 30 days why he should not be declared a vexatious litigant subject to prefiling restrictions. The decision discusses the standards for frivolous filings, appointment of post-conviction counsel, and vexatious-litigant restrictions.

CASE DETAILS

COURT	United States District Court for the District of Idaho
WRITING FOR THE COURT	David C. Nye
JURISDICTION	United States District Court for the District of Idaho
DECIDED	February 4, 2026
DOCKET	4:24-cv-00376-DCN
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner filed a 28 U.S.C. § 2255 action seeking to vacate or set aside his sentence and, while an appeal from denial of that petition was pending, filed numerous additional motions and letters. The district court denied the outstanding motions as frivolous and ordered petitioner to show cause why he should not be declared a vexatious litigant subject to prefiling restrictions.
STANDARD OF REVIEW	Abuse-of-discretion principles govern sanctions and the appointment of counsel; the court applied the Ninth Circuit's standards for determining frivolousness and imposing prefiling restrictions on abusive litigants.
PRECEDENTIAL VALUE	unpublished
PARTIES	Rydon Clyde Teton v. The United States of America

TOPICS

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

PRACTICE AREAS

federal habeas corpus

post-conviction relief

civil procedure

sanctions

appellate procedure

QUESTIONS PRESENTED

1. Whether Teton's outstanding motions and related filings were frivolous and should be denied.
2. Whether Teton was entitled to appointment of counsel in his noncapital § 2255 proceeding.
3. Whether the record warranted issuing an order to show cause concerning designation as a vexatious litigant and imposition of prefiling restrictions.

HOLDINGS

1. The court denied the outstanding motions and found the filings frivolous because they were baseless, lacked a reasonable prospect of success, repeated matters already decided, sought relief unavailable from the court, or consisted of conclusory allegations without factual or legal analysis.
2. The motion to appoint counsel was denied because, although it was not frivolous, Teton had not identified any nonfrivolous claim and was therefore unlikely to succeed on the merits.
3. The court ordered Teton to show cause within 30 days why he should not be declared a vexatious litigant subject to a prefiling order; it did not yet enter the prefiling restriction.
4. The false-statements allegations were frivolous because Teton did not identify the allegedly false statements, show prosecutorial knowledge, identify false testimony, or establish a reasonable likelihood that the statements affected his guilty plea or conviction.

KEY QUOTATIONS

“Restricting access to the courts is, however, a serious matter. The right of access to the courts is a fundamental right protected by the Constitution.” (III.B)

“Thus, when district courts seek to impose pre-filing restrictions, they must (1) give litigants notice and an opportunity to oppose the order before it is entered” (III.B)

FACTUAL BACKGROUND

Teton pleaded guilty to voluntary manslaughter and use of a firearm during a crime of violence and was sentenced to 133 months in prison. After the district court denied his § 2255 motion and while his appeal was pending, he filed numerous motions and letters, many of which duplicated filings in his criminal case. The court found that nearly all of those filings were frivolous, although it concluded that the motion to appoint post-conviction counsel was not frivolous because it cited relevant authority and presented a plausible, though ultimately unsuccessful, argument.

PROCEDURAL HISTORY

Teton pleaded guilty in his criminal case and received a 133-month sentence. He filed this § 2255 action, which the district court denied with prejudice on April 14, 2025; his appeal was summarily dismissed by the Ninth Circuit on October 24, 2025. During the pendency of the appeal, he filed 17 documents in the civil case, many

duplicatively filed in the criminal case. The court denied the outstanding motions and issued an order to show cause regarding a possible vexatious-litigant prefiling order.

DISPOSITION

other

CASES CITED

- Chevron U.S.A., Inc. v. M&M Petroleum Servs., Inc., 658 F.3d 948, 952 (9th Cir. 2011)
- DeDios v. Int'l Realty Invs., 641 F.3d 1071, 1076 (9th Cir. 2011)
- Thomas v. Ponder, 611 F.3d 1144, 1150 (9th Cir. 2010)
- De Long v. Hennessy, 912 F.2d 1144, 1147 (9th Cir. 1990)
- Ringgold-Lockhart v. Cnty. of Los Angeles, 761 F.3d 1057, 1061-62 (9th Cir. 2014)
- Napue v. Illinois
- Glossip v. Oklahoma, 604 U.S. 226, 246 (2025)
- Redd v. Guerrero, 84 F.4th 874, 880 (9th Cir. 2023)
- Weygandt v. Look, 718 F.2d 952, 954 (9th Cir. 1983)
- Stokes v. Roe, 18 F. App'x 478 (9th Cir. 2001)

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