

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
GEORGIA, MACON DIVISION

William R. Jackson v. Warden Gregory Sampson

Jackson v. Sampson · No. 5:25-CV-86 (MTT) · Decided November 24, 2025

SUMMARY

The court overrules William R. Jackson’s objection to a magistrate judge’s order concerning his motion to strike the respondent’s answer and request for a hearing. Applying the clearly erroneous or contrary-to-law standard under 28 U.S.C. § 636(b)(1)(A), the court finds no error in directing the respondent to resend the answer and supporting exhibits and explains that default judgment is unavailable in federal habeas corpus proceedings.

CASE DETAILS

COURT	United States District Court for the Middle District of Georgia, Macon Division
WRITING FOR THE COURT	Marc T. Treadwell
JURISDICTION	United States District Court for the Middle District of Georgia, Macon Division
DECIDED	November 24, 2025
DOCKET	5:25-CV-86 (MTT)
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner objected under 28 U.S.C. § 636(b)(1)(A) to a magistrate judge's order partially denying and partially granting his motion to strike Respondent's answer and denying his motion for a hearing in a federal habeas case.
STANDARD OF REVIEW	A magistrate judge's ruling on a non-dispositive motion may be disturbed only if it is clearly erroneous or contrary to law under 28 U.S.C. § 636(b)(1)(A).
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	William R. Jackson v. Warden Gregory Sampson

TOPICS

- federal habeas corpus
- default judgment
- civil procedure
- motions to dismiss

PRACTICE AREAS

Federal habeas corpus

Civil procedure

QUESTIONS PRESENTED

1. Whether the magistrate judge's order concerning the mailing of Respondent's answer and supporting exhibits was clearly erroneous or contrary to law.
2. Whether Jackson's disagreement with the substance of Respondent's answer required an evidentiary hearing or demonstrated procedural unfairness.
3. Whether Respondent's failure to mail the answer to Jackson's current address constituted perjury, fraud, or other reversible misconduct.
4. Whether default judgment is available as a remedy in a federal habeas corpus proceeding if the respondent fails to answer.

HOLDINGS

1. A district court may disturb a magistrate judge's ruling on a non-dispositive motion only when the ruling is clearly erroneous or contrary to law.
2. The magistrate judge did not clearly err by finding that Respondent mailed Jackson's copy of the answer and supporting exhibits to a previous address and directing Respondent to resend them.
3. Jackson's arguments that Respondent could not refute grounds in his petition did not establish procedural unfairness or require an evidentiary hearing; those arguments could be raised in his reply.
4. Default judgment is not an available remedy in a federal habeas corpus case merely because the respondent fails to answer.

KEY QUOTATIONS

"Since the Magistrate Judge clearly acted within his statutorily granted authority in deciding a non-dispositive motion, the Court may only disturb his ruling when it is "shown that the magistrate judge's order is clearly erroneous or contrary to law." (at 1)

"Finally, as the Magistrate Judge already explained to Jackson, even if the Respondent failed to answer, "default judgment is not an available remedy in federal habeas corpus cases." (at 2)

FACTUAL BACKGROUND

Respondent timely filed an answer and supporting exhibits but mailed Jackson's copy to a previous address. The magistrate judge directed Respondent to update the mailing records and resend the materials, while denying Jackson's motion for a hearing. Jackson objected, asserting that Respondent could not honestly refute grounds in his petition and alleging that Respondent and the magistrate judge had engaged in procedural misconduct.

PROCEDURAL HISTORY

Magistrate Judge Charles H. Weigle found that Respondent had mailed the answer and supporting exhibits to Petitioner's previous address, directed Respondent to update the mailing records and resend the materials, and denied Petitioner's request for a hearing. Jackson objected, arguing that the answer was substantively inadequate, that the magistrate judge improperly acted for Respondent, and that Respondent committed perjury or fraud. The district court reviewed the order for clear error or legal error and overruled the objection.

DISPOSITION

other

CASES CITED

- Holton v. City Thomasville Sch. Dist., 425 F.3d 1325, 1350 (11th Cir. 2005)
- Weeks v. Samsung Heavy Indus. Co., 126 F.3d 926, 943 (7th Cir. 1997)
- Aziz v. Leferve, 830 F.2d 184, 187 (11th Cir. 1987)

OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF GEORGIA
MACON DIVISION WILLIAM R. JACKSON,))) Petitioner,)) v.) CIVIL ACTION NO. 5:25-
CV-86 (MTT)) Warden GREGORY SAMPSON,))) Respondent.)) ORDER On November 4,
2025, United States Magistrate Judge Charles H. Weigle issued an Order (ECF 39) denying in part
and granting in part Petitioner William R. Jackson's motion to strike the Respondent's answer
(ECF 37) and denying his motion for hearing (ECF 38).

ECF 18. Finding that the Respondent mailed a copy of his answer to a previous address for Jackson, the Magistrate Judge directed the Respondent to update his mailing records and to resend the answer and supporting exhibits. Id. Jackson filed an Objection challenging the Magistrate Judge's decision. ECF 44. Since the Magistrate Judge clearly acted within his statutorily granted authority in deciding a non-dispositive motion, the Court may only disturb his ruling when it is "shown that the magistrate judge's order is clearly erroneous or contrary to law." 28 U.S.C. 636(b)(1)(A). "Clear error is a highly deferential standard of review." Holton v. City Thomasville Sch.

Dist., 425 F.3d 1325, 1350 (11th Cir. 2005) (citation omitted). "[A] finding is 'clearly erroneous' when although there is evidence to support it, the reviewing court on the entire evidence is left with the definite and firm conviction that a mistake has been committed." Id. (citations omitted); see also Weeks v. Samsung Heavy Indus. Co., 126 F.3d 926, 943 (7th Cir.

1997) ("The clear error standard [under Rule 72(a) and 28 U.S.C. § 636(b)(1)(A)] means that the district [judge] can overturn the magistrate judge's ruling only if the district court is left with the definite and firm conviction that a mistake has been made.").

In his Objection, Jackson apparently takes issue with substance of the Respondent's answer, arguing "the Respondent cannot refute honestly Ground One" and "cannot refute honestly Ground Two" of his recast petition. ECF 44 at 1. He argues that these "concrete issues ... are intentionally disrupting the procedure for an evidentiary hearing." Id. Further, he argues that the Magistrate Judge "answer[ed] for" the Respondent in finding that "it appears that Respondent mailed Petitioner's copy of the answer and supporting exhibits to a previous address" (ECF 39 at 1), and claims that the Respondent committed "perjury and fraud upon the Court." ECF 44 at 2.

Finally, Jackson maintains that the Magistrate Judge is "favoring clearly the Respondent" and that "for the Magistrate to grant additional time to Respondent without justification and proof respondent had not known of Petitioner's current address is prejudicial, miscarriage of justice, and non-waivable error." Id. at 3-4. Upon review of the Order and Jackson's Objection, the Court finds no clear error in the Magistrate Judge's decision.

First, Jackson's insistence that the Respondent cannot refute grounds in his amended petition does not constitute procedural unfairness that would require an evidentiary hearing. These are simply arguments that Jackson may raise in his reply.

Second, contrary to Jackson's contentions, the Respondent committed no perjury or fraud. The Respondent timely filed his answer with the Court and mailed it to Jackson's previous address. ECF 3, 33. This determination requires no speculation by the Court nor "answer" from the Respondent because it is clear from the face of the document. ECF 33-1 at 10. It is Jackson who is speculating that the Respondent would claim—although he has not—that the Respondent "was not aware of Petitioner's current address." ECF 44 at 2.

Finally, as the Magistrate Judge already explained to Jackson, even if the Respondent failed to answer, "default judgment is not an available remedy in federal habeas corpus cases." ECF 31 at 1-2 (citing *Aziz v. Leferve*, 830 F.2d 184, 187 (11th Cir. 1987)).

Accordingly, the Court **OVERRULES** Jackson's Objection (ECF 44) to the Magistrate Judge's Order (ECF 39). **SO ORDERED**, this 24th day of November, 2025. S/ Marc T. Treadwell **MARC T. TREADWELL, JUDGE UNITED STATES DISTRICT COURT**