

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PRECEDENTIAL VALUE	unpublished district court order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)