

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
CALIFORNIA

Bryson v. Madden

No. 3:22-cv-00556-JES-VET (S.D. Cal. Feb. 28, 2025) · No. 3:22-cv-00556-JES-VET · Decided February 28, 2025

SUMMARY

The United States District Court for the Southern District of California denied Petitioner Ronald Bryson’s motion for summary judgment in his 28 U.S.C. § 2254 habeas proceeding. The court held that summary judgment is an inappropriate mechanism in federal habeas proceedings and stated that it would address the merits of the amended petition in due course.

CASE DETAILS

COURT	United States District Court for the Southern District of California
WRITING FOR THE COURT	James E. Simmons Jr.
JURISDICTION	United States District Court for the Southern District of California
DECIDED	February 28, 2025
DOCKET	3:22-cv-00556-JES-VET
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner in a federal habeas proceeding under 28 U.S.C. § 2254 moved for summary judgment and immediate release without an evidentiary hearing.
STANDARD OF REVIEW	The court applied the statutory and procedural framework governing § 2254 proceedings, including the presumption of correctness for state-court factual determinations under 28 U.S.C. § 2254(e)(1), and concluded that Federal Rule of Civil Procedure 56 is incompatible with that framework in this context.
PRECEDENTIAL VALUE	Unpublished district court order; precedential status unknown
PARTIES	Ronald Bryson v. Raymond Madden, Rob Bonta

TOPICS

- federal habeas corpus
- summary judgment
- post-conviction relief
- civil procedure

PRACTICE AREAS

Federal habeas corpus

Civil procedure

QUESTIONS PRESENTED

1. Whether a federal habeas petitioner may use a Federal Rule of Civil Procedure 56 summary judgment motion to obtain habeas relief or immediate release.
2. Whether the court should resolve the merits of the amended § 2254 petition through summary judgment without an evidentiary hearing.

HOLDINGS

1. A motion for summary judgment is not an appropriate mechanism for resolving the habeas relief sought in a federal § 2254 proceeding because Rule 56's requirement that factual inferences be drawn in favor of the nonmovant is incompatible with § 2254(e)(1)'s presumption that state-court factual determinations are correct.

KEY QUOTATIONS

“Federal Rule of Civil Procedure 56, which requires a court to draw all factual inferences in the nonmovant’s favor . . . is apparently inconsistent and incompatible with 28 U.S.C. § 2254(e)(1), which states that ‘a determination of factual issue made by a State court shall be presumed to be correct.’” (at 1)

“Motions for summary judgment are inappropriate in federal habeas proceedings.” (at 1)

FACTUAL BACKGROUND

Bryson filed an amended petition for a writ of habeas corpus under 28 U.S.C. § 2254 containing 120 grounds for relief and more than 2,000 pages of argument and exhibits. After respondents filed an answer, Bryson sought summary judgment, an evidentiary hearing, and immediate release from custody. The court determined that summary judgment was not an appropriate procedural vehicle for resolving the habeas relief sought.

PROCEDURAL HISTORY

Bryson filed an amended § 2254 habeas petition asserting 120 grounds for relief. Respondents answered and requested denial of the petition without an evidentiary hearing. Bryson filed a traverse and a petitioner-initiated motion for summary judgment. The district court denied the motion, stating that it would address the merits of the amended petition through the appropriate habeas procedures.

DISPOSITION

other

CASES CITED

- *Atkins v. Montgomery*, No. 2:18-cv-06877-DOC-MAA, 2019 U.S. Dist. LEXIS 233137 (C.D. Cal. June 25, 2019)

- *Mendoza v. Pollard*, No. 20-cv-0847-GPC (RBB), 2021 U.S. Dist. LEXIS 118295 (S.D. Cal. June 24, 2021)

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