UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE

Roderick Bates v. Warden Brian Eller

Bates v. Eller, No. 2:25-CV-181-CLC-CRW (E.D. Tenn. Mar. 5, 2026) · No. 2:25-CV-181-CLC-CRW · Decided March 5, 2026

SUMMARY

The United States District Court for the Eastern District of Tennessee dismissed Roderick Bates's petition for a writ of habeas corpus under 28 U.S.C. § 2254 as untimely under the AEDPA statute of limitations. The court granted the respondent's motion to dismiss with prejudice and denied a certificate of appealability.

CASE DETAILS

COURT	United States District Court for the Eastern District of Tennessee
WRITING FOR THE COURT	Curtis L. Collier
JURISDICTION	United States District Court for the Eastern District of Tennessee
DECIDED	March 5, 2026
DOCKET	2:25-CV-181-CLC-CRW
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner sought federal habeas relief under 28 U.S.C. § 2254. Respondent moved to dismiss the petition as barred by AEDPA's one-year statute of limitations, and the court granted the motion, dismissed the petition with prejudice, and denied a certificate of appealability.
STANDARD OF REVIEW	A habeas petition may be dismissed as untimely under AEDPA's statute of limitations. Equitable tolling requires diligence and an extraordinary circumstance preventing timely filing. A procedural dismissal warrants a certificate of appealability only if reasonable jurists could debate both the validity of a constitutional claim and the correctness of the procedural ruling.
PRECEDENTIAL VALUE	unpublished; nonprecedential district-court memorandum opinion
PARTIES	Roderick Bates v. Warden Brian Eller

TOPICS

federal habeas corpus | post-conviction relief | actual innocence | appellate procedure

PRACTICE AREAS

federal habeas corpus | state post-conviction relief | appellate procedure

QUESTIONS PRESENTED

1. Whether Bates's 28 U.S.C. § 2254 petition was barred by AEDPA's one-year statute of limitations.
2. Whether statutory tolling during the state post-conviction proceedings rendered the federal petition timely.
3. Whether Bates established entitlement to equitable tolling or a credible showing of actual innocence sufficient to overcome the limitations bar.
4. Whether a certificate of appealability should issue after dismissal on procedural grounds.

HOLDINGS

1. The petition was untimely because the conviction became final on August 3, 2016, the limitations period ran for 273 days before state post-conviction proceedings tolled it, resumed on September 13, 2024, and expired on December 13, 2024; Bates did not file his federal petition until May 16, 2025.
2. Equitable tolling did not apply because Bates made no argument establishing that he had pursued his rights diligently or that an extraordinary circumstance prevented timely filing.
3. Bates did not overcome the limitations bar through actual innocence because he presented no credible showing that, in light of all the evidence, no reasonable juror would have convicted him.
4. A certificate of appealability was denied because reasonable jurists would not find it debatable that the petition was untimely.

KEY QUOTATIONS

> *"To establish an entitlement to equitable tolling, a petitioner must demonstrate "(1) that he has been pursuing his rights diligently, and (2) that some extraordinary circumstance stood in his way" to prevent timely filing."* (Section II)

> *"Accordingly, the Court finds that the instant petition is untimely, and Respondent's motion should be granted."* (Section III)

> *"Because reasonable jurists would not find it debatable that the instant petition is untimely, the Court will deny a COA."* (Section IV)

FACTUAL BACKGROUND

Following a 2014 trial, a Hamilton County jury convicted Roderick Bates and co-defendant Emmett Jones of especially aggravated burglary and first-degree murder, and Bates received an effective life sentence. Bates pursued direct review and state post-conviction relief, but the Tennessee courts denied relief, with the Tennessee

Supreme Court denying permission to appeal on September 12, 2024. He later filed a federal habeas petition on May 16, 2025, more than one year after the AEDPA limitations period expired.

PROCEDURAL HISTORY

A Hamilton County, Tennessee jury convicted Bates in 2014 of especially aggravated burglary and first-degree murder and imposed an effective life sentence. The Tennessee Court of Criminal Appeals affirmed, and the Tennessee Supreme Court denied permission to appeal on May 5, 2016. Bates filed a state post-conviction petition on May 4, 2017; relief was denied, the denial was affirmed, and the Tennessee Supreme Court denied permission to appeal on September 12, 2024. Bates filed this federal habeas petition on May 16, 2025, initially in the Middle District of Tennessee; the action was transferred to the Eastern District of Tennessee. The court concluded that the petition was untimely and that Bates had not established equitable tolling or a credible showing of actual innocence.

DISPOSITION

dismissed

CASES CITED

- State v. Bates, No. E2014-01741-CCA-R3-CD, 2015 WL 9019818, at *1-2, *14 (Tenn. Crim. App. Dec. 15, 2015)
- Bates v. State, No. E2023-00278-CCA-R3-PC, 2024 WL 915163, at *1 (Tenn. Crim. App. Mar. 4, 2024)
- Lindh v. Murphy, 521 U.S. 320, 336 (1997)
- Brand v. Motley, 526 F.3d 921, 925 (6th Cir. 2008)
- Cook v. Stegall, 295 F.3d 517, 521 (6th Cir. 2002)
- Holland v. Florida, 560 U.S. 631, 645, 649 (2010)
- Pace v. DiGuglielmo, 544 U.S. 408, 418 (2005)
- Keeling v. Warden, Lebanon Corr. Inst., 673 F.3d 452, 462 (6th Cir. 2012)
- Ata v. Scutt, 662 F.3d 736, 741 (6th Cir. 2011)
- McQuiggin v. Perkins, 569 U.S. 383, 392 (2013)
- Bousley v. United States, 523 U.S. 614, 623 (1998)
- Schlup v. Delo, 513 U.S. 298, 327-328 (1995)
- Gonzalez v. Thaler, 565 U.S. 134, 137 (2012)
- Slack v. McDaniel, 529 U.S. 473, 484 (2000)

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