

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH
CAROLINA

Anthony M. Hudson v. Warden Tonya James

Hudson · No. 4:25-2575-JFA-TER · Decided January 7, 2026

SUMMARY

The United States District Court for the District of South Carolina adopts the Magistrate Judge’s Report and Recommendation and grants the respondent’s motion for summary judgment in Anthony M. Hudson’s 28 U.S.C. § 2254 habeas action. The court rejects Hudson’s objections concerning ineffective assistance of counsel, the validity of his guilty plea, procedural default, and counsel’s alleged failure to file a direct appeal. The petition is dismissed, and a certificate of appealability is denied.

CASE DETAILS

COURT	United States District Court for the District of South Carolina
WRITING FOR THE COURT	Joseph F. Anderson, Jr.
JURISDICTION	United States District Court for the District of South Carolina
DECIDED	January 7, 2026
DOCKET	4:25-2575-JFA-TER
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner sought federal habeas relief under 28 U.S.C. § 2254. After the Magistrate Judge recommended granting Respondent's motion for summary judgment, Petitioner filed objections. The District Court reviewed the objections, adopted the Report and Recommendation, granted summary judgment, dismissed the petition, and denied a certificate of appealability.
STANDARD OF REVIEW	The District Court conducts de novo review of portions of a magistrate judge's report to which specific objections are made, and reviews unobjected-to or nonspecific portions for clear error. In reviewing the § 2254 claims, the court applies the deference required by 28 U.S.C. § 2254(d) to state-court adjudications and defers to state-court factual determinations, including credibility findings.
PRECEDENTIAL VALUE	nonprecedential

PARTIES

Anthony M. Hudson v. Warden Tonya James

TOPICS

federal habeas corpus

post-conviction relief

ineffective assistance

summary judgment

procedural due process

PRACTICE AREAS

Federal habeas corpus

Post-conviction relief

Criminal procedure

Ineffective assistance of counsel

QUESTIONS PRESENTED

1. Whether Hudson's objections to the Magistrate Judge's recommendation concerning grounds two and three were sufficiently specific to warrant de novo review and whether those grounds were procedurally barred.
2. Whether the state post-conviction court's rejection of Hudson's claim that counsel failed to ensure a knowing, voluntary, and intelligent guilty plea was contrary to or an unreasonable application of clearly established federal law, or based on an unreasonable factual determination.
3. Whether the state post-conviction court's rejection of Hudson's claim that plea counsel was ineffective for failing to file a direct appeal was contrary to or an unreasonable application of *Hill v. Lockhart* and *Strickland v. Washington*, or based on an unreasonable factual determination.
4. Whether Hudson was entitled to a certificate of appealability.

HOLDINGS

1. Objections that do not address the Magistrate Judge's procedural-bar reasoning and instead reargue the underlying merits are nonspecific; the District Court therefore need not conduct de novo review of those issues and may review them for clear error. The court found no clear error in the recommendation that grounds two and three were procedurally barred.
2. The state post-conviction court's determination that Hudson's guilty plea was knowingly, voluntarily, and intelligently entered, and that he failed to satisfy *Strickland*'s requirements, was not contrary to or an unreasonable application of clearly established federal law and was not based on an unreasonable determination of the facts. Habeas relief on ground one was therefore denied.
3. The state post-conviction court's rejection of Hudson's claim that counsel was ineffective for failing to file a direct appeal was not contrary to or an unreasonable application of *Hill v. Lockhart* or *Strickland* and was not based on an unreasonable determination of the facts. Habeas relief on ground four was therefore denied.
4. A certificate of appealability was denied because Hudson failed to make a substantial showing of the denial of a constitutional right.

KEY QUOTATIONS

“The recommendation has no presumptive weight, and the responsibility to make a final determination remains with the Court.” (Opinion, Part II)

“Importantly, a review of an ineffective assistance of counsel claim is not simply a review of the merits; rather, review is focused upon whether the state court decision was reasonable.” (Opinion, Part III)

“Accordingly, this Court adopts the Magistrate Judge’s Report and Recommendation and incorporates it herein by reference.” (Opinion, Part IV)

FACTUAL BACKGROUND

Hudson challenged his guilty pleas in South Carolina state court to voluntary manslaughter and attempted armed robbery. He received concurrent sentences of twenty-eight years for voluntary manslaughter and twenty years for attempted armed robbery. His federal petition asserted ineffective assistance concerning the knowing and intelligent nature of his plea, the failure to investigate his mental health, and the failure to file a direct appeal, as well as a claim that evidence warranted a trial.

PROCEDURAL HISTORY

Hudson challenged his South Carolina convictions and sentences through a § 2254 petition. The matter was referred to a Magistrate Judge, who recommended granting Respondent's motion for summary judgment, concluding that two grounds were procedurally barred and that the remaining ineffective-assistance claims failed under the applicable deferential standards. The District Court overruled Hudson's objections, adopted the Report and Recommendation, granted summary judgment, dismissed the petition, and denied a certificate of appealability.

DISPOSITION

dismissed

CASES CITED

- Mathews v. Weber, 423 U.S. 261 (1976)
- Carniewski v. West Virginia Board of Probation & Parole, 974 F.2d 1330 (4th Cir. 1992)
- Camby v. Davis, 718 F.2d 198, 199-200 (4th Cir. 1983)
- Diamond v. Colonial Life & Accident Insurance Co., 416 F.3d 310, 315-16 (4th Cir. 2005)
- Dunlap v. TM Trucking of the Carolinas, LLC, No. 0:15-cv-04009-JMC, 2017 WL 6345402, at *5 n.6 (D.S.C. Dec. 12, 2017)
- Workman v. Perry, No. 6:17-cv-00765-RBH, 2017 WL 4791150, at *1 (D.S.C. Oct. 23, 2017)
- Orpiano v. Johnson, 687 F.2d 44, 47 (4th Cir. 1982)
- Staley v. Norton, No. 9:07-0288-PMD, 2007 WL 821181, at *1 (D.S.C. Mar. 2, 2007)
- Howard v. Secretary of Health & Human Services, 932 F.2d 505, 509 (6th Cir. 1991)
- Johnson v. State, 294 S.C. 310, 364 S.E.2d 201 (1988)
- Strickland v. Washington, 466 U.S. 668 (1984)

- Hill v. Lockhart, 474 U.S. 52 (1985)
- Williams v. Taylor, 529 U.S. 362 (2000)
- Miller-El v. Cockrell, 537 U.S. 322, 336 (2003)
- Slack v. McDaniel, 529 U.S. 473, 484 (2000)
- Rose v. Lee, 252 F.3d 676, 683 (4th Cir. 2001)

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