

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
WEST VIRGINIA

Juvonta Lafond v. FCI Beckley Warden

Civil Action No. 5:24-cv-558 (S.D. W. Va. May 5, 2026) · No. 5:24-cv-558 · Decided May 5, 2026

SUMMARY

The United States District Court for the Southern District of West Virginia adopted a magistrate judge’s proposed findings and recommendation in Juvonta Lafond’s petition for habeas corpus under 28 U.S.C. § 2241. Because Lafond had been released from custody and no objections were filed, the court dismissed the petition as moot and removed the case from the docket.

CASE DETAILS

COURT	United States District Court for the Southern District of West Virginia
WRITING FOR THE COURT	W. Volk
JURISDICTION	United States District Court for the Southern District of West Virginia
DECIDED	May 5, 2026
DOCKET	5:24-cv-558
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2241 reviewed after referral to a magistrate judge for proposed findings and recommendation.
STANDARD OF REVIEW	Absent timely and specific objections to a magistrate judge's proposed findings and recommendation, the district court need not conduct de novo review of the unobjected-to portions; general and conclusory objections also do not require de novo review.
PRECEDENTIAL VALUE	Unknown
PARTIES	Juvonta Lafond v. FCI Beckley Warden

TOPICS

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

PRACTICE AREAS

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

QUESTIONS PRESENTED

1. Whether the district court was required to conduct de novo review of the magistrate judge's PF&R when no objections were filed.
2. Whether Lafond's § 2241 petition should be dismissed as moot following his release from custody.

HOLDINGS

1. The district court was not required to conduct de novo review of the magistrate judge's factual or legal conclusions because no timely objections were filed.
2. The § 2241 petition was moot because Lafond had been released from custody, and the action was dismissed as moot.

KEY QUOTATIONS

“The Court need not review, under a de novo or any other standard, the factual or legal conclusions of the magistrate judge as to those portions of the findings or recommendation to which no objections are addressed.”

FACTUAL BACKGROUND

Lafond filed a petition for a writ of habeas corpus under § 2241 while in federal custody. He was released from custody before resolution of the petition. The magistrate judge recommended dismissal as moot, and Lafond filed no objections.

PROCEDURAL HISTORY

Lafond filed a § 2241 habeas petition on October 9, 2024. The matter was referred to Magistrate Judge Omar J. Aboulhosn, who recommended dismissal as moot because Lafond had been released from custody. No objections were filed by the January 22, 2026 deadline, and the district court adopted the PF&R, dismissed the petition as moot, and removed the case from the docket.

DISPOSITION

dismissed

CASES CITED

- Thomas v. Arn, 474 U.S. 140 (1985)
- United States v. De Leon-Ramirez, 925 F.3d 177, 181 (4th Cir. 2019)
- Snyder v. Ridenour, 889 F.2d 1363, 1366 (4th Cir. 1989)
- Orpiano v. Johnson, 687 F.2d 44, 47 (4th Cir. 1982)

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