

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Paul C. Williams v. Richard Bosley, et al.

Williams v. Bosley, Civil Action No. 18-13092 (ZNQ) (TJB) (D.N.J. Jan. 28, 2026) · No. 18-13092 (ZNQ) (TJB) · Decided January 28, 2026

SUMMARY

The United States District Court for the District of New Jersey denies pro se plaintiff Paul C. Williams’s motion to recuse Judge Zahid N. Quraishi under 28 U.S.C. § 455. The court holds that the plaintiff’s disagreements with trial procedures, evidentiary rulings, courtroom conduct, and post-trial orders do not demonstrate extrajudicial bias or the level of antagonism required for recusal.

CASE DETAILS

COURT	United States District Court for the District of New Jersey
WRITING FOR THE COURT	Zahid N. Quraishi
JURISDICTION	United States District Court for the District of New Jersey
DECIDED	January 28, 2026
DOCKET	18-13092 (ZNQ) (TJB)
DISPOSITION	other
PROCEDURAL POSTURE	Pro se plaintiff moved under 28 U.S.C. § 455(a) to recuse the district judge after a jury trial and related post-trial proceedings. The court denied the recusal motion, vacated an earlier text order concerning suspected unauthorized recordings, denied the plaintiff's emergent motion for stay and reconsideration as moot, and directed entry of judgment on the jury verdict.
STANDARD OF REVIEW	Recusal under 28 U.S.C. § 455(a) is evaluated under an objective reasonable-person standard based on all known facts. The movant must state material facts with particularity, show that the facts would convince a reasonable person that bias exists, and establish that the bias is personal rather than judicial.
PRECEDENTIAL VALUE	Unpublished, nonprecedential district court opinion

TOPICS

- civil procedure
- evidence
- contempt
- sanctions
- section 1983

PRACTICE AREAS

civil procedure

civil rights

judicial disqualification

evidence

QUESTIONS PRESENTED

1. Whether the district judge's trial-management decisions, including requiring question-and-answer testimony rather than narrative testimony from the pro se plaintiff, established grounds for recusal under 28 U.S.C. § 455(a).
2. Whether the judge's evidentiary rulings, courtroom conduct, and alleged communications with defense counsel demonstrated personal or extrajudicial bias or antagonism requiring recusal.
3. Whether the judge's post-trial actions concerning suspected unauthorized recordings established a valid basis for recusal.
4. Whether the January 22, 2026 text order concerning the recordings should be vacated and the plaintiff's emergent motion for stay and reconsideration denied as moot.

HOLDINGS

1. The court's refusal to permit plaintiff to testify in narrative form and its use of standby counsel for direct examination were within the court's discretion and did not establish grounds for recusal under 28 U.S.C. § 455(a).
2. Disagreement with the court's evidentiary rulings, expressions of frustration, and alleged gestures toward defense counsel did not establish the personal, extrajudicial bias or degree of antagonism required for recusal.
3. The judge's post-trial inquiries and orders concerning suspected unauthorized recordings did not establish a valid basis for recusal because plaintiff failed to show personal or extrajudicial bias or deep-seated antagonism.

KEY QUOTATIONS

“Because [Section] 455(a) is intended to promote not only fairness to the litigants but also public confidence in the judiciary, a party seeking recusal need not demonstrate that the judge is actually biased, but rather that he would appear to be biased to a reasonable person, with knowledge of all of the facts.” (§ III)

“judicial rulings alone almost never constitute a valid basis for a bias or partiality motion” (§ IV.B)

“Not establishing bias or partiality . . . are expressions of impatience, dissatisfaction, annoyance, and even anger, that are within the bounds of what imperfect men and women, even after having been confirmed as federal judges, sometimes display.” (§ IV.B)

FACTUAL BACKGROUND

Plaintiff represented himself at a January 2026 jury trial, with standby counsel assigned to conduct his direct examination after the court refused to permit narrative testimony. The jury returned a unanimous no-cause verdict on plaintiff's excessive-force and warrantless-cell-phone-search claims. After trial, plaintiff sought

recusal based on the court's trial-management and evidentiary rulings, alleged favorable gestures toward defense counsel, and orders addressing suspected unauthorized recording of court proceedings.

PROCEDURAL HISTORY

The matter was tried before Judge Quraishi from January 12 through 14, 2026. The jury returned a unanimous no-cause verdict, finding that plaintiff failed to prove objectively unreasonable force or an unlawful warrantless search of his cell phone. After the trial, plaintiff sought recusal based on the court's trial-management decisions, evidentiary rulings, alleged communications with defense counsel, and post-trial orders concerning possible unauthorized recordings.

DISPOSITION

other

CASES CITED

- United States v. Jacobs, 311 F. App'x 535, 537 (3d Cir. 2008)
- United States v. Thompson, 483 F.2d 527, 528 (3d Cir. 1973)
- Securacomm Consulting, Inc. v. Securacom, Inc., 224 F.3d 273, 278 (3d Cir. 2000)
- Jacobsen v. Citi Mortgage, Inc., 2017 WL 3877850, at *1 (D.N.J. Sept. 5, 2017)
- Johnson v. Trueblood, 629 F.2d 287, 291 (3d Cir. 1980)
- Thompson v. Eva's Village & Sheltering Program, 2005 WL 2474930, at *2 (D.N.J. Oct. 5, 2005)
- Liteky v. United States, 510 U.S. 540, 555-56 (1994)
- United States v. Gallagher, 576 F.2d 1028, 1039 (3d Cir. 1978)
- Jacobsen v. Citi Mortgage, Inc., 715 F. App'x 222, 223 (3d Cir. 2018)
- Arrowpoint Capital Corp. v. Arrowpoint Asset Management, LLC, 793 F.3d 313, 330 (3d Cir. 2015)
- Smith v. Danyo, 585 F.2d 83, 87 (3d Cir. 1978)
- Chichakli v. Gerlach, 2018 WL 3625840, at *3 (W.D. Okla. July 30, 2018)
- United States v. Williams, 2024 WL 3540519, at *8 (D.N.J. July 23, 2024)
- Kaufman LLC v. Estate of Feinberg, 2022 WL 13845083, at *8 (D. Conn. Oct. 24, 2022)
- United States v. Boukamp, 105 F.4th 717, 749 (5th Cir. 2024)
- United States v. Wecht, 484 F.3d 194, 218 (3d Cir. 2007)
- Higgs v. Attorney General, 655 F.3d 333, 339 (3d Cir. 2011)

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