

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
OHIO, WESTERN DIVISION AT DAYTON

Norris v. Watson

Norris · No. 3:25-cv-00133 · Decided February 12, 2026

SUMMARY

The document is a magistrate judge’s Report and Recommendations in Adam T. Norris’s 28 U.S.C. § 2254 habeas corpus action challenging his Ohio drug convictions and sentences. It recommends dismissal with prejudice because Norris procedurally defaulted his claims by failing to timely appeal to the Ohio Supreme Court and offered no cause or prejudice to excuse the default. The report also concludes in the alternative that the claims would not warrant federal habeas relief on the merits.

CASE DETAILS

COURT	United States District Court for the Southern District of Ohio, Western Division at Dayton
WRITING FOR THE COURT	Michael R. Merz
JURISDICTION	United States District Court for the Southern District of Ohio, Western Division at Dayton
DECIDED	February 12, 2026
DOCKET	3:25-cv-00133
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner sought federal habeas corpus relief under 28 U.S.C. § 2254 from his Ohio drug convictions and sentences. The magistrate judge issued a Report and Recommendations recommending dismissal with prejudice, denial of a certificate of appealability, and certification that an appeal would be objectively frivolous.
STANDARD OF REVIEW	Under the procedural-default framework, the court considered whether an applicable state procedural rule was violated, whether the state courts enforced it, whether the rule was an adequate and independent state ground, and whether the petitioner showed cause and prejudice. Federal habeas review is limited to violations of the Constitution, laws, or treaties of the United States and does not permit reexamination of state-law questions.
PRECEDENTIAL VALUE	nonprecedential

PARTIES

Adam T. Norris v. Tom Watson, Warden, North Central Correctional Institution

TOPICS

federal habeas corpus

post-conviction relief

appellate procedure

sentencing

due process

PRACTICE AREAS

federal habeas corpus

criminal procedure

sentencing

post-conviction relief

QUESTIONS PRESENTED

1. Whether Norris's federal habeas claims were procedurally defaulted because he failed to timely appeal the Ohio Court of Appeals' judgment to the Ohio Supreme Court.
2. Whether Norris demonstrated cause and prejudice sufficient to excuse the procedural default.
3. Whether the asserted challenges to his maximum and consecutive sentences and Ohio's Reagan Tokes Law stated a cognizable federal habeas claim.

HOLDINGS

1. Norris's habeas claims were procedurally defaulted because he failed to file a timely appeal from the Ohio Court of Appeals' judgment, and the Ohio courts denied his request for a delayed appeal.
2. Even if the petition were reviewed on the merits, Norris's challenges to the state-law sentencing determinations would not warrant federal habeas relief.

KEY QUOTATIONS

"[I]t is not the province of a federal habeas court to reexamine state court determinations on state law questions. In conducting habeas review, a federal court is limited to deciding whether a conviction violated the Constitution, laws, or treaties of the United States."

FACTUAL BACKGROUND

A Greene County grand jury indicted Norris on multiple counts of aggravated drug trafficking and aggravated drug possession. A trial jury found him guilty, and he received a sentence of sixteen to twenty-four years. On direct appeal, the Ohio Court of Appeals partially sustained one assignment of error and remanded for imposition of a maximum twenty-year sentence. Norris did not timely appeal to the Ohio Supreme Court, his motion for a delayed appeal was denied, and he later filed a federal habeas petition challenging his sentence, the use of a confidential informant's statements, and Ohio's Reagan Tokes indefinite-sentencing scheme.

PROCEDURAL HISTORY

Norris was convicted by a jury in the Greene County Court of Common Pleas of multiple drug-trafficking and drug-possession offenses and was sentenced to sixteen to twenty-four years of imprisonment. The Ohio Court of Appeals granted one assignment of error in part and remanded for imposition of a maximum twenty-year

sentence. Norris did not timely appeal to the Ohio Supreme Court, and that court denied his motion for a delayed appeal. After resentencing without a further appeal, Norris filed this § 2254 petition. The magistrate judge concluded that all claims were procedurally defaulted and alternatively failed to state a federal habeas claim.

DISPOSITION

other

CASES CITED

- Barton v. Warden, S. Ohio Corr. Facility, 786 F.3d 450, 464 (6th Cir. 2015)
- Guilmette v. Howes, 624 F.3d 286, 290 (6th Cir. 2010) (en banc)
- Eley v. Bagley, 604 F.3d 958, 965 (6th Cir. 2010)
- Reynolds v. Berry, 146 F.3d 345, 347-48 (6th Cir. 1998)
- County Court of Ulster County v. Allen, 442 U.S. 140, 149 (1979)
- Lott v. Coyle, 261 F.3d 594, 601-02 (6th Cir. 2001)
- Jacobs v. Mohr, 265 F.3d 407, 417 (6th Cir. 2001)
- Hartman v. Bagley, 492 F.3d 347, 357 (6th Cir. 2007)
- Monzo v. Edwards, 281 F.3d 568, 576 (6th Cir. 2002)
- Atkins v. Holloway, 792 F.3d 654, 657 (6th Cir. 2015)
- Bonilla v. Hurley, 370 F.3d 494, 497 (6th Cir. 2004)
- Oregon v. Ice, 555 U.S. 160 (2009)
- Wilson v. Corcoran, 562 U.S. 1 (2010)
- Lewis v. Jeffers, 497 U.S. 764, 780 (1990)
- Smith v. Phillips, 455 U.S. 209 (1982)
- Barclay v. Florida, 463 U.S. 939 (1983)
- Estelle v. McGuire, 502 U.S. 62, 67-68 (1991)
- Elmendorf v. Taylor, 23 U.S. (10 Wheat.) 152, 160 (1825)
- Bickham v. Winn, 888 F.3d 248 (6th Cir. Apr. 23, 2018) (Thapar, J., concurring)