

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WASHINGTON

Ryan Scott Adams v. State of Washington

Adams · No. 3:25-cv-05659-BHS-DWC · Decided January 21, 2026

SUMMARY

The United States District Court for the Western District of Washington reviews Magistrate Judge David W. Christel’s denial of Ryan Scott Adams’s motion for recusal. The court concludes that the petitioner’s alleged predisposition, discovery limitations, and prior adverse ruling do not establish grounds for recusal under 28 U.S.C. §§ 144 or 455. The court affirms the denial of the recusal motion.

CASE DETAILS

COURT	United States District Court for the Western District of Washington
WRITING FOR THE COURT	David G. Estudillo
JURISDICTION	United States District Court for the Western District of Washington
DECIDED	January 21, 2026
DOCKET	3:25-cv-05659-BHS-DWC
DISPOSITION	affirmed
PROCEDURAL POSTURE	The district court reviewed Magistrate Judge David W. Christel's denial of Petitioner Ryan Scott Adams's motion for recusal under Local Civil Rule 3(f), 28 U.S.C. §§ 144 and 455.
STANDARD OF REVIEW	Recusal is evaluated under the objective standard of whether a reasonable person with knowledge of all the facts would conclude that the judge's impartiality might reasonably be questioned.
PRECEDENTIAL VALUE	Unknown; district court order with no reported citation in the source.
PARTIES	Ryan Scott Adams v. State of Washington

TOPICS

- civil procedure
- motion for reconsideration

PRACTICE AREAS

- federal civil procedure
- judicial disqualification and recusal
- federal habeas corpus procedure

QUESTIONS PRESENTED

1. Whether Magistrate Judge Christel's statement concerning a motion for reconsideration, limitations on discovery, and prior adverse rulings required recusal under 28 U.S.C. §§ 144 or 455.

HOLDINGS

1. Recusal was not required because the magistrate judge's statement, properly understood, concerned the court's decision on motions for extensions and did not indicate that his impartiality might reasonably be questioned.
2. A party's disagreement with a judge's rulings, including rulings concerning discovery, does not provide a proper basis for recusal.

KEY QUOTATIONS

“Recusal is required if a judge’s impartiality might reasonably be questioned or if the judge harbors personal bias or prejudice against a party.” (at 1)

“disagreement with the magistrate judge's rulings does not provide a basis for recusal” (at 2)

FACTUAL BACKGROUND

Adams sought recusal of Magistrate Judge Christel based on Christel's statement that Adams could move for reconsideration, restrictions on Adams's access to discovery, and Christel's prior ruling against him in a separate case. Adams interpreted the reconsideration statement as indicating that Christel was predisposed to dismiss his petition, but Christel explained that the statement concerned the court's rulings on motions for extensions rather than the merits of the case. The district court found no evidence suggesting that Christel's impartiality could reasonably be questioned.

PROCEDURAL HISTORY

Adams filed a motion seeking recusal of Magistrate Judge Christel and later filed a supplement construed as a motion for reconsideration. Judge Christel denied the recusal motion. Pursuant to Local Civil Rule 3(f), the matter was referred to the district judge for review, and the district court affirmed the denial.

DISPOSITION

affirmed

CASES CITED

- *Liteky v. United States*, 510 U.S. 540, 555 (1994)
- *Agha-Khan v. Mortgage Elec. Registration Sys., Inc.*, 2022 WL 501564, at *1 (9th Cir. Feb. 18, 2022)
- *Mayes v. Leipziger*, 729 F.2d 605, 607 (9th Cir. 1984)
- *Yagman v. Republic Ins.*, 987 F.2d 622, 626 (9th Cir. 1993)
- *Preston v. United States*, 923 F.2d 731, 734 (9th Cir. 1991)

- *Downs v. California Atty. Gen.*, 639 F. App'x 435, 436 (9th Cir. 2016)

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