

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Raghvendra Singh v. People of California

No. 2:23-cv-2423 TLN AC P · No. No. 2:23-cv-2423 TLN AC P · Decided August 21, 2025

SUMMARY

The United States District Court for the Eastern District of California recommends dismissing without prejudice Raghvendra Singh’s 28 U.S.C. § 2254 habeas petition. The court concludes that Younger abstention applies to claims challenging the conviction while the state proceedings were pending, and that claims concerning California time credits are state-law claims that are also apparently unexhausted. The court grants the substitution of Kathleen N. Ratliff, the warden at California Health Care Facility, as respondent.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Allison Claire
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	August 21, 2025
DOCKET	No. 2:23-cv-2423 TLN AC P
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner sought federal habeas relief under 28 U.S.C. § 2254. Respondent moved to dismiss. The magistrate judge recommended granting the motion and dismissing the petition without prejudice, while ordering substitution of the warden as respondent.
STANDARD OF REVIEW	The court applied the Younger abstention requirements, the federal habeas cognizability limitation under 28 U.S.C. § 2254(a), and the AEDPA exhaustion requirement under 28 U.S.C. § 2254(b).
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Raghvendra Singh v. People of California, Kathleen N. Ratliff, substituted respondent

TOPICS

- federal habeas corpus
- state post-conviction relief
- comity
- federalism
- civil procedure

PRACTICE AREAS

federal habeas corpus

state post-conviction relief

constitutional law

civil procedure

QUESTIONS PRESENTED

1. Whether federal habeas review should be abstained from under *Younger* because petitioner's direct state criminal proceedings were pending when he filed the federal petition.
2. Whether claims challenging the calculation of California custody credits are cognizable in federal habeas.
3. Whether Claims One and Five were unexhausted because petitioner had not presented his credit claims fairly to California's highest court.
4. Whether respondent's request to substitute Kathleen N. Ratliff, the warden at California Health Care Facility, should be granted.

HOLDINGS

1. *Younger* abstention is warranted where all four requirements are met: an ongoing state judicial proceeding, an important state interest, an adequate opportunity to raise constitutional challenges, and requested relief that would enjoin or have the practical effect of enjoining the state proceeding. Because petitioner's direct appeal was pending when the federal petition was filed, all four criteria were satisfied, and no extraordinary exception was shown.
2. Claims alleging miscalculation of California custody or class credits under California law are not cognizable in federal habeas because federal habeas relief is available only for custody violating the Constitution, laws, or treaties of the United States.
3. Claims One and Five should be dismissed as unexhausted because petitioner did not provide California's highest court a full and fair opportunity to consider his custody-credit claims before seeking federal habeas relief.
4. Kathleen N. Ratliff, the warden at California Health Care Facility, should be substituted as respondent, and the docket should be updated accordingly.

KEY QUOTATIONS

"Younger abstention is a jurisprudential doctrine rooted in overlapping principles of equity, comity, and federalism." (Discussion, section II.C.i)

"A petitioner satisfies the exhaustion requirement by providing the state's highest court with a full and fair opportunity to consider his claims before presenting them to the federal court." (Discussion, section II.C.iii)

*"For the foregoing reasons, the requirements for *Younger* abstention are satisfied with respect to Claims Two, Three, Four, and Six and those claims should be dismissed without prejudice."* (Conclusion)

FACTUAL BACKGROUND

On July 24, 2023, petitioner was convicted of filing a false or forged instrument in Sacramento County Superior Court and received a determinate three-year sentence. His direct appeal was pending when he filed the federal habeas petition on October 16, 2023. The petition raised claims concerning work and class credits, the criminality of the charged conduct, health-based relief, sufficiency of the evidence, and reduction of the charges.

PROCEDURAL HISTORY

Petitioner was convicted in Sacramento County Superior Court and sentenced to a determinate three-year term. He appealed, and the California Court of Appeal affirmed; the California Supreme Court denied review on September 11, 2024. He filed the federal habeas petition on October 16, 2023, while his direct appeal was still pending. The magistrate judge recommended dismissal of Claims Two, Three, Four, and Six under *Younger* abstention, and dismissal of Claims One and Five because they presented noncognizable state-law claims and appeared unexhausted.

DISPOSITION

dismissed

CASES CITED

- *Younger v. Harris*, 401 U.S. 37 (1971)
- *Arevalo v. Hennessy*, 882 F.3d 763, 765 (9th Cir. 2018)
- *San Jose Silicon Valley Chamber of Com. Pol. Action Comm. v. City of San Jose*, 546 F.3d 1087, 1091-92 (9th Cir. 2008)
- *ReadyLink Healthcare, Inc. v. State Comp. Ins. Fund*, 754 F.3d 754, 758 (9th Cir. 2014)
- *AmerisourceBergen Corp. v. Roden*, 495 F.3d 1143, 1149 (9th Cir. 2007)
- *Beltran v. State of California*, 871 F.2d 777, 782 (9th Cir. 1988)
- *Kitchens v. Bowen*, 825 F.2d 1337, 1341 (9th Cir. 1987)
- *Fresh Int'l Corp. v. Agric. Lab. Rels. Bd.*, 805 F.2d 1353, 1358 (9th Cir. 1986)
- *Kelly v. Robinson*, 479 U.S. 36, 49 (1986)
- *Commc'ns Telesystems Int'l v. Cal. Pub. Util. Comm'n*, 196 F.3d 1011, 1020 (9th Cir. 1999)
- *Moore v. Sims*, 442 U.S. 415, 426 (1979)
- *Baffert v. Cal. Horse Racing Bd.*, 332 F.3d 613, 621 (9th Cir. 2003)
- *Phillips v. Neuschmid*, No. 2:19-cv-3225 RGK AFM, 2019 WL 6312573, at *2, 2019 U.S. Dist. LEXIS 204615, at *5 (C.D. Cal. Oct. 18, 2019)
- *Edelbacher v. Calderon*, 160 F.3d 582, 585 (9th Cir. 1998)
- *Middlesex Cnty. Ethics Comm. v. Garden State Bar Ass'n*, 457 U.S. 423, 435 (1982)
- *Perez v. Ledesma*, 401 U.S. 82, 85 (1971)
- *Honeycutt v. Lowery*, No. 3:14-cv-0046 RCJ VPC, 2014 WL 3784100, at *1, 2014 U.S. Dist. LEXIS 104925, at *2 (D. Nev. July 31, 2014)
- *Estelle v. McGuire*, 502 U.S. 62, 67-68 (1991)

- Middleton v. Cupp, 768 F.2d 1083, 1085-86 (9th Cir. 1985)
- Lewis v. Jeffers, 497 U.S. 764, 780 (1990)
- Kitchen v. Jaime, No. 18-cv-6514 JEM, 2021 WL 597874, at *7-8, 2021 U.S. Dist. LEXIS 28588, at *17-18 (C.D. Cal. Feb. 16, 2021)
- Grandberry v. Soto, No. 15-cv-7435 DMC JC, 2016 WL 8732426, at *4, 2016 U.S. Dist. LEXIS 185813, at *7-9 (C.D. Cal. June 15, 2016)
- McClellan v. Valenzuela, No. 1:13-cv-1602 LJO SKO, 2016 WL 7374580, at *10, 2016 U.S. Dist. LEXIS 175340, at *24-25 (E.D. Cal. Dec. 19, 2016)
- Picard v. Connor, 404 U.S. 270, 276 (1971)
- Houston v. Lack, 487 U.S. 266, 276 (1988)
- Martinez v. Ylst, 951 F.2d 1153 (9th Cir. 1991)

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