

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Spillers v. Covello

Spillers · No. 2:24-cv-1865 WBS CKD P · Decided October 15, 2025

SUMMARY

The United States District Court for the Eastern District of California recommends granting the respondent’s motion to dismiss a state prisoner’s second amended habeas corpus petition under 28 U.S.C. § 2254. The court concludes that the petitioner identified no violation of federal law and, alternatively, that California’s sentence-credit provisions did not entitle him to the additional credits claimed.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	October 15, 2025
DOCKET	2:24-cv-1865 WBS CKD P
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner filed a second amended petition for a writ of habeas corpus under 28 U.S.C. § 2254, and respondent moved to dismiss. The magistrate judge issued findings and recommendations recommending dismissal of the petition and closure of the case.
STANDARD OF REVIEW	Under 28 U.S.C. § 2254(a), federal habeas relief is available only for violations of the Constitution or laws of the United States; alleged errors in interpreting or applying state law do not support federal habeas relief.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Joseph D. Spillers v. Patrick Covello

TOPICS

- federal habeas corpus
- post-conviction relief
- motions to dismiss
- due process
- sentence modification

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the second amended § 2254 petition stated a cognizable federal habeas claim when it challenged the application of California sentence-credit law without identifying a violation of the Constitution or federal law.
2. Whether petitioner was entitled to additional sentence credit under Title 15 California Code of Regulations § 3043.2(b)(4) or (5) based on his minimum-security status despite his violent-felony conviction.

HOLDINGS

1. A federal habeas petition must be dismissed when it alleges only an error in the interpretation or application of state law and does not identify a violation of the Constitution or laws of the United States.
2. Petitioner was not entitled to the additional sentence credit provided by Title 15 California Code of Regulations § 3043.2(b)(4) or (5) because he was convicted of a violent felony and did not allege that he completed firefighter training or was housed at a fire camp in a qualifying non-firefighter role.

KEY QUOTATIONS

“An application for a writ of habeas corpus by a person in custody under a judgment of a state court can be granted only for violations of the Constitution or laws of the United States.” (at 1)

“A federal writ of habeas corpus is not available for alleged error in the interpretation or application of state law.” (at 1)

FACTUAL BACKGROUND

Petitioner is a California state prisoner serving a determinate or indeterminate sentence for carjacking, identified as a violent felony. He claimed that he was entitled to more sentence credit because he was a minimum-security prisoner. The court noted that California regulations generally provided him one day of credit for every two days in custody and that the enhanced-credit provisions he invoked did not apply to violent-felony inmates absent firefighter training or placement at a fire camp, neither of which he alleged.

PROCEDURAL HISTORY

Spillers, a state prisoner proceeding pro se, filed a second amended § 2254 petition challenging the amount of good-conduct sentence credit applied to his sentence. Respondent moved to dismiss, arguing that the petition failed to identify a violation of federal law. The court recommended granting the motion, dismissing the petition, and closing the case, subject to objections and review by the assigned district judge.

DISPOSITION

dismissed

CASES CITED

- Wilson v. Corcoran, 562 U.S. 1, 5 (2010)
- Estelle v. McGuire, 502 U.S. 62, 67-68 (1991)
- Park v. California, 202 F.2d 1146, 1149 (9th Cir. 2000)
- Martinez v. Ylst, 951 F.2d 1153 (9th Cir. 1991)

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