

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
WASHINGTON

William B. Rowan v. Jefferey Perkins

Rowan · No. 1:25-CV-03158-TOR · Decided January 6, 2026

SUMMARY

The United States District Court for the Eastern District of Washington dismissed William B. Rowan’s pro se petition for a writ of habeas corpus under 28 U.S.C. § 2254 with prejudice. The court found that Rowan failed to amend the petition as directed and that his claims concerning the constitutionality of Washington’s non-corroboration statute were not cognizable habeas claims; it also denied a certificate of appealability.

CASE DETAILS

COURT	United States District Court for the Eastern District of Washington
WRITING FOR THE COURT	Thomas O. Rice
JURISDICTION	United States District Court for the Eastern District of Washington
DECIDED	January 6, 2026
DOCKET	1:25-CV-03158-TOR
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner filed a pro se petition for a writ of habeas corpus under 28 U.S.C. § 2254. After the court ordered petitioner to amend the deficient petition within sixty days, petitioner filed nothing further, and the court dismissed the action with prejudice under Rule 4.
STANDARD OF REVIEW	Preliminary review under Rule 4 of the Rules Governing Section 2254 Cases in the United States District Courts.
PRECEDENTIAL VALUE	unpublished
PARTIES	William B. Rowan v. Jefferey Perkins

TOPICS

- federal habeas corpus
- post-conviction relief
- pleadings
- motions to dismiss
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the deficient § 2254 petition should be dismissed after petitioner failed to amend it as ordered.
2. Whether a federal habeas claim challenging the constitutionality of RCW 9A.44.020(1), a state non-corroboration statute, is cognizable.
3. Whether petitioner demonstrated that the petition was timely and that each claim was properly exhausted.

HOLDINGS

1. The action was properly dismissed with prejudice under Rule 4 because petitioner failed to comply with the court's order to amend the deficient petition within sixty days.
2. Petitioner's challenge to the constitutionality of RCW 9A.44.020(1), a state non-corroboration statute, was not a cognizable federal habeas claim.
3. Petitioner failed to demonstrate that his federal habeas petition was timely or that each claim was properly exhausted.

KEY QUOTATIONS

“This action is DISMISSED with prejudice pursuant to Rule 4, Rules Governing Section 2254 Cases in the United States District Courts.” (at 2)

“A certificate of appealability is DENIED.” (at 2)

FACTUAL BACKGROUND

William B. Rowan, an incarcerated individual proceeding pro se, filed a § 2254 petition and paid the \$5 filing fee. The petition challenged the constitutionality of RCW 9A.44.020(1), a state non-corroboration statute, but the court concluded that the asserted challenge was not cognizable in federal habeas corpus. The court also noted that petitioner had not shown that the petition was timely or that each claim had been exhausted, and petitioner failed to comply with the order requiring amendment.

PROCEDURAL HISTORY

The court previously advised petitioner that his § 2254 petition was deficient and ordered him to file an amended petition within sixty days. Petitioner did not amend or otherwise file anything further, and respondent had not been served. The court dismissed the action with prejudice, denied a certificate of appealability, and directed the clerk to close the file.

DISPOSITION

dismissed

CASES CITED

- Smith v. Ryan, 823 F.3d 1270, 1282 (9th Cir. 2016)
- Rhoades v. Henry, 611 F.3d 1133, 1142 (9th Cir. 2010)
- Peltier v. Wright, 15 F.3d 860, 861-62 (9th Cir. 1994)

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