

SUPREME COURT OF ALABAMA

Ex parte Woods

941 So. 2d 259 (Ala. 2006) · No. 1041615 · Decided April 21, 2006

SUMMARY

The Supreme Court of Alabama granted Robert Earl Woods's petition for a writ of mandamus. The court held that his challenge to Alabama Department of Corrections disciplinary sanctions was properly brought as a petition for writ of certiorari, not habeas corpus, because the sanctions did not implicate a liberty interest. It directed the Montgomery Circuit Court to vacate its order converting and transferring the petition, holding that venue was proper in Montgomery County.

CASE DETAILS

COURT	Supreme Court of Alabama
WRITING FOR THE COURT	See, Justice; Nabers, C.J.; Harwood, J.; Stuart, J.; Bolin, J.
JURISDICTION	Alabama
DECIDED	April 21, 2006
DOCKET	1041615
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Woods petitioned the Supreme Court of Alabama for a writ of mandamus directing the Montgomery Circuit Court to vacate an order that converted his petition for writ of certiorari into a habeas corpus petition and transferred it to the St. Clair Circuit Court.
STANDARD OF REVIEW	Mandamus is extraordinary relief available only upon a showing of a clear legal right to the requested order, an imperative duty on the respondent accompanied by a refusal to perform it, the lack of another adequate remedy, and properly invoked jurisdiction.
PRECEDENTIAL VALUE	Published precedential opinion of the Supreme Court of Alabama
PARTIES	Robert Earl Woods v. State of Alabama, Alabama Department of Corrections

TOPICS

- writ of certiorari
- venue
- administrative law
- appellate procedure
- remedies

PRACTICE AREAS

civil procedure

administrative law

prison disciplinary proceedings

extraordinary writs

habeas corpus

QUESTIONS PRESENTED

1. Whether Woods's challenge to the Department of Corrections disciplinary decision was properly brought as a petition for writ of certiorari rather than as a petition for writ of habeas corpus.
2. Whether the Montgomery Circuit Court had the proper venue to hear Woods's certiorari petition against the Department of Corrections.
3. Whether Woods established a clear legal right to mandamus relief directing the Montgomery Circuit Court to vacate its conversion and transfer order.

HOLDINGS

1. Because the Department of Corrections sanctions did not implicate any liberty interest or restrain a liberty Woods presently enjoyed, his petition could not properly be reviewed as a petition for writ of habeas corpus; the proper vehicle was a petition for writ of certiorari.
2. A petition for writ of certiorari challenging action by the Alabama Department of Corrections should be filed in the Montgomery Circuit Court, where the Department maintains its headquarters; the Montgomery Circuit Court therefore had proper venue and the transfer to St. Clair County was erroneous.
3. Woods established a clear legal right to mandamus relief, and the Supreme Court of Alabama granted the petition and issued the writ directing the Montgomery Circuit Court to vacate its order.

KEY QUOTATIONS

“A writ of mandamus is an extraordinary form of relief.” (260-261)

“The courts of this State have long recognized that the only purpose of the writ of habeas corpus is to afford relief against actual restraints upon liberty.” (261)

“Therefore, Woods's certiorari petition cannot be reviewed as a petition for the writ of habeas corpus; it does not seek relief from a restraint on any liberty Woods presently enjoys.” (262)

FACTUAL BACKGROUND

While detained at the St. Clair Correctional Facility, Robert Earl Woods was accused of possessing contraband and lying to a corrections officer. An Alabama Department of Corrections disciplinary board found him guilty and imposed sanctions including removal from prison programs and positions and ineligibility for certain transfers and housing. Woods alleged due-process violations but stated that the sanctions did not deprive him of a liberty interest.

PROCEDURAL HISTORY

An Alabama Department of Corrections disciplinary board found Woods guilty of violating prison regulations and imposed sanctions that did not affect a liberty interest. Woods sought review in the Montgomery Circuit

Court by petition for writ of certiorari. The Montgomery Circuit Court converted the petition into a habeas corpus petition and transferred it to the St. Clair Circuit Court. The Court of Criminal Appeals dismissed Woods's mandamus petition without an opinion, after which Woods sought mandamus relief in the Supreme Court of Alabama.

DISPOSITION

writ_granted

REMAND INSTRUCTIONS

The Montgomery Circuit Court was directed to vacate its order converting Woods's petition for writ of certiorari into a petition for writ of habeas corpus and transferring the petition to the St. Clair Circuit Court.

CASES CITED

- Ex parte Alabama Department of Mental Health & Mental Retardation, 837 So. 2d 808, 810 (Ala. 2002)
- Ex parte Puccio, 923 So. 2d 1069, 1072 (Ala. 2005)
- Ex parte McInnis, 820 So. 2d 795, 798 (Ala. 2001)
- Ex parte City of Tuskegee, 932 So. 2d 895, 900 (Ala. 2005)
- Ex parte Boykins, 862 So. 2d 587, 591 (Ala. 2002)
- State v. Speake, 187 Ala. 426, 427, 65 So. 840, 841 (1914)
- Williams v. State, 42 Ala. App. 140, 140, 155 So. 2d 322, 323 (1963)
- Wolff v. McDonnell, 418 U.S. 539, 558 (1974)
- Slawson v. Alabama Forestry Commission, 631 So. 2d 953, 957 (Ala. 1994)
- Boykins v. State, 862 So. 2d 594, 595 (Ala. Crim. App. 2003)
- Ex parte Harper, 934 So. 2d 1045, 1047 (Ala. 2006)
- Ex parte Children's Hospital of Alabama, 931 So. 2d 1, 5 (Ala. 2005)