

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Richard A. Vaughn, Sr. v. Commonwealth of Pennsylvania, et al.

No. 1:25-cv-01675 (M.D. Pa. Feb. 24, 2026) · No. No. 1:25-cv-01675 · Decided February 24, 2026

SUMMARY

The United States District Court for the Middle District of Pennsylvania dismissed Richard A. Vaughn’s amended petition for a writ of habeas corpus under 28 U.S.C. § 2254 as untimely under AEDPA. The court rejected equitable tolling based on Vaughn’s alleged lack of trial transcripts and ignorance of the law, declined to issue a certificate of appealability, and directed the Clerk of Court to close the case.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Yvette Kane
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	February 24, 2026
DOCKET	No. 1:25-cv-01675
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2254 by a state prisoner, dismissed at preliminary screening as untimely under AEDPA.
STANDARD OF REVIEW	Under Rule 4 governing § 2254 cases, the court must dismiss a petition if it plainly appears from the petition and attached exhibits that the petitioner is not entitled to relief. Procedural dismissal of a habeas petition requires denial of a certificate of appealability unless reasonable jurists could debate both the validity of a constitutional claim and the procedural ruling.
PRECEDENTIAL VALUE	unpublished
PARTIES	Richard A. Vaughn, Sr. v. Commonwealth of Pennsylvania, et al.

TOPICS

[federal habeas corpus](#)

[statute of limitations](#)

[state post-conviction relief](#)

[post-conviction relief](#)

PRACTICE AREAS

federal habeas corpus

post-conviction relief

criminal procedure

QUESTIONS PRESENTED

1. Whether Vaughn's amended § 2254 petition was timely under AEDPA's one-year statute of limitations.
2. Whether statutory or equitable tolling applied to excuse the untimely filing.
3. Whether a certificate of appealability should issue following dismissal on procedural grounds.

HOLDINGS

1. Vaughn's § 2254 petition was untimely because his state-court judgment became final on December 19, 2019, the federal limitations period expired on December 19, 2020 subject to statutory tolling, and the petition was not filed until August 25, 2025.
2. Equitable tolling was not warranted because Vaughn did not show diligent pursuit of his rights or an extraordinary circumstance that prevented timely filing.
3. No certificate of appealability should issue because reasonable jurists would not debate the procedural dismissal of Vaughn's untimely petition.

KEY QUOTATIONS

“A ‘petitioner’ is ‘entitled to equitable tolling’ only if [they] show[] ‘(1) that [they] ha[ve] been pursuing [their] rights diligently, and (2) that some extraordinary circumstance stood in [their] way’ and prevented timely filing.” (Discussion III.A)

“When the district court denies a habeas petition on procedural grounds without reaching the prisoner’s underlying constitutional claim, a COA should issue when the prisoner shows, at least, that jurists of reason would find it debatable whether the petition states a valid claim of the denial of a constitutional right and that jurists of reason would find it debatable whether the district court was correct in its procedural ruling” (Discussion III.B)

FACTUAL BACKGROUND

A Franklin County jury convicted Vaughn of corruption of minors, unlawful contact with a minor involving sexual offenses, attempted indecent assault of a person under sixteen, and indecent assault of a person under sixteen. He received a sentence of twenty-five to fifty years of state confinement. After unsuccessful direct review and state post-conviction proceedings, he filed a federal § 2254 petition nearly four years after the expiration of the applicable federal limitations period, asserting claims involving trial fairness, appellate rights, transcripts, PCRA counsel, and the absence of a grand-jury indictment.

PROCEDURAL HISTORY

Vaughn was convicted in the Franklin County Court of Common Pleas and sentenced to a minimum of twenty-five years and a maximum of fifty years of confinement. The Pennsylvania Superior Court affirmed his judgment of sentence on November 19, 2019, and affirmed dismissal of his counseled PCRA petition on October

12, 2021. Vaughn filed this federal habeas action on August 25, 2025; the Eastern District of Pennsylvania transferred it to the Middle District of Pennsylvania. After granting in forma pauperis status and permitting amendment, the court dismissed the amended petition as untimely, declined to issue a certificate of appealability, and directed the Clerk to close the case.

DISPOSITION

dismissed

CASES CITED

- Commonwealth v. Vaughn, No. 94 MDA 2019, 2019 WL 6137827, at *1 (Pa. Super. Ct. Nov. 19, 2019)
- Commonwealth v. Vaughn, No. 352 MDA 2021, 2021 WL 4739509, at *3 (Pa. Super. Ct. Oct. 12, 2021)
- Orabi v. Attorney General of the United States, 738 F.3d 535, 537 n.1 (3d Cir. 2013)
- Wilson v. McVey, 579 F. Supp. 2d 685, 688 n.5 (M.D. Pa. 2008)
- Jones v. Morton, 195 F.3d 153, 157 (3d Cir. 1999)
- Kapral v. United States, 166 F.3d 565, 575 (3d Cir. 1999)
- Morris v. Horn, 187 F.3d 333, 337 n.1 (3d Cir. 1999)
- Lovasz v. Vaughn, 134 F.3d 146, 148 (3d Cir. 1998)
- Holland v. Florida, 560 U.S. 631, 634, 649 (2010)
- Pace v. DiGuglielmo, 544 U.S. 408, 418-19 (2005)
- Satterfield v. Johnson, 434 F.3d 185, 195 (3d Cir. 2006)
- Fahy v. Horn, 240 F.3d 239, 244 (3d Cir. 2001)
- Sistrunk v. Rozum, 674 F.3d 181, 190 (3d Cir. 2012)
- Merritt v. Blaine, 326 F.3d 157, 170 (3d Cir. 2003)
- School District of Allentown v. Marshall, 657 F.2d 16, 21 (3d Cir. 1981)
- Slack v. McDaniel, 529 U.S. 473, 484 (2000)