

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OHIO, EASTERN DIVISION

Ryan Keith Stills v. Stephen Reynolds, Warden

Stills · No. 1:25-cv-02760 · Decided January 6, 2026

SUMMARY

The United States District Court for the Northern District of Ohio denied Ryan Keith Stills’s petition for a writ of habeas corpus under 28 U.S.C. § 2254 and dismissed the action without prejudice. The court held that claims concerning medical care and access to the courts challenged conditions of confinement and were not cognizable in habeas, while the sentencing-authority claim involved state-law issues and was either unexhausted or procedurally barred. The court also declined to issue a certificate of appealability and certified that an appeal could not be taken in good faith.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Eastern Division
WRITING FOR THE COURT	Pamela A. Barker
JURISDICTION	United States District Court for the Northern District of Ohio, Eastern Division
DECIDED	January 6, 2026
DOCKET	1:25-cv-02760
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner filed a pro se petition for a writ of habeas corpus under 28 U.S.C. § 2254 challenging his Ohio state-court custody and seeking early release. The district court denied the petition and dismissed the action without prejudice under Rule 4 of the Rules Governing Section 2254 Cases.
STANDARD OF REVIEW	Under AEDPA, federal habeas relief generally may not be granted on a claim adjudicated on the merits in state court unless the state decision was contrary to, or involved an unreasonable application of, clearly established Supreme Court law, or was based on an unreasonable determination of the facts. State factual determinations are presumed correct subject to rebuttal by clear and convincing evidence. The petition was also screened under Rule 4 of the Rules Governing Section 2254 Cases.

PRECEDENTIAL VALUE	Unpublished district-court memorandum opinion; persuasive only and not controlling precedent.
PARTIES	Ryan Keith Stills v. Stephen Reynolds, Warden

TOPICS

federal habeas corpus post-conviction relief procedural due process prisoners rights appellate procedure

PRACTICE AREAS

Federal habeas corpus post-conviction relief constitutional law criminal procedure civil rights

QUESTIONS PRESENTED

1. Whether claims concerning allegedly inadequate prison medical care and denial of access to the courts are cognizable in a 28 U.S.C. § 2254 habeas petition.
2. Whether Stills's claim that the state sentencing court lacked authority because his probation allegedly expired presents a federal habeas claim or only an issue of state sentencing law.
3. Whether the potentially federal claim was barred from habeas review because Stills failed to exhaust available state remedies and procedurally defaulted the claim.
4. Whether the petition should be dismissed at screening under Rule 4 of the Rules Governing Section 2254 Cases.

HOLDINGS

1. Claims challenging prison medical care and denial of access to the courts concern conditions of confinement, not the legality of the state conviction or sentence, and therefore are not cognizable in a § 2254 habeas petition.
2. A claim concerning how Ohio calculates the beginning and end of a sentence or tolls probation is a matter of state law and is not cognizable in federal habeas review unless it independently establishes a violation of federal law.
3. A state prisoner must fairly present each federal constitutional claim to the state courts, including the state's highest court, before seeking federal habeas relief, unless an applicable exception excuses exhaustion.
4. A federal constitutional claim that was not properly presented through the state's ordinary appellate review process is generally procedurally defaulted and unavailable for federal habeas merits review.

KEY QUOTATIONS

“Generally, a federal court's authority in a habeas proceeding under § 2254 extends only to determining the legality of the Petitioner’s state-court conviction and sentence, and not to addressing the conditions of his confinement.” (5)

“Simply stated, a federal court may review only federal claims that were evaluated on the merits by a state court.” (8-9)

“Consequently, Petitioner must exhaust his state court remedies before this Court can consider this ground in a habeas petition” (9)

FACTUAL BACKGROUND

Stills pleaded guilty in Ohio to attempted illegal conveyance of drugs onto the grounds of a specified governmental facility and possession of drugs. He initially received community control and treatment-related conditions, but after alleged violations, including a positive methamphetamine test, failures to report, and failures to submit to testing, the state court revoked community control and imposed consecutive prison terms totaling twenty-one months. Stills alleged that his custody was based on a void judgment, that prison medical care placed him at substantial risk of serious harm, and that his medical and cognitive conditions impaired his access to the courts.

PROCEDURAL HISTORY

Stills pleaded guilty in the Lake County Court of Common Pleas and initially received community control. After alleged probation violations, the state court terminated community control and imposed consecutive prison terms. An appeal filed by Stills's wife as next friend was dismissed because the notice of appeal was not personally signed by Stills or by a licensed attorney. Stills did not appeal to the Supreme Court of Ohio and filed this federal habeas petition before obtaining state-court merits review.

DISPOSITION

dismissed

CASES CITED

- State of Ohio v. Stills, No. 21-CR-000943 (Lake Cty. Comm. Pl. Ct. Jan. 23, 2023)
- State of Ohio v. Stills, No. 2025-L-046 (Ohio 11th Dist. App. Ct. June 30, 2025)
- Lindh v. Murphy, 521 U.S. 320, 336 (1997)
- Woodford v. Garceau, 538 U.S. 202, 206, 210 (2003)
- Barker v. Yukins, 199 F.3d 867, 871 (6th Cir. 1999)
- Williams v. Taylor, 529 U.S. 362, 436 (2000)
- Wilkins v. Timmerman-Cooper, 512 F.3d 768, 774-76 (6th Cir. 2008)
- Nelson v. Campbell, 541 U.S. 637, 643 (2004)
- Gall v. Parker, 231 F.3d 265, 303 (6th Cir. 2000)
- Greer v. Mitchell, 264 F.3d 663, 675 (6th Cir. 2001)
- Estelle v. McGuire, 502 U.S. 62, 67 (1991)
- Baldwin v. Reese, 541 U.S. 27 (2004)
- O'Sullivan v. Boerckel, 526 U.S. 838, 848 (1999)

- Rust v. Zent, 17 F.3d 155, 160 (6th Cir. 1994)
- Manning v. Alexander, 912 F.2d 878, 881 (6th Cir. 1990)
- Wagner v. Smith, 581 F.3d 410, 414 (6th Cir. 2009)
- Frazier v. Huffman, 343 F.3d 780, 797 (6th Cir. 2003)
- Koontz v. Glossa, 731 F.2d 365, 369 (6th Cir. 1984)
- Wong v. Money, 142 F.3d 313, 322 (6th Cir. 1998)
- Daniels v. United States, 532 U.S. 374, 381 (2001)
- Williams v. Anderson, 460 F.3d 789, 806 (6th Cir. 2006)
- Engle v. Isaac, 456 U.S. 107, 125 n.28 (1982)
- Maupin v. Smith, 785 F.2d 135, 138 (6th Cir. 1986)
- Coleman v. Thompson, 501 U.S. 722, 732 (1991)