

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
ALABAMA

Rodney Wayne Patterson v. Warden Dewayne Estes

Patterson v. Estes · No. 5:18-cv-02059-MHH · Decided March 24, 2026

SUMMARY

This memorandum opinion addresses Rodney Wayne Patterson’s 28 U.S.C. § 2254 petition challenging his Alabama attempted-murder conviction. The court considers whether Patterson’s speedy-trial and ineffective-assistance claims were exhausted or procedurally defaulted, recounting the relevant state-court proceedings and applying federal habeas principles.

CASE DETAILS

COURT	United States District Court for the Northern District of Alabama
WRITING FOR THE COURT	E. Hughes Haikala
JURISDICTION	United States District Court for the Northern District of Alabama
DECIDED	March 24, 2026
DOCKET	5:18-cv-02059-MHH
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petition for federal habeas relief under 28 U.S.C. § 2254 from an Alabama attempted-murder conviction. The district court previously found the petition timely through equitable tolling and then considered whether the speedy-trial and ineffective-assistance claims were exhausted and procedurally defaulted.
STANDARD OF REVIEW	Under AEDPA, federal habeas relief on a claim adjudicated on the merits in state court is unavailable unless the state decision was contrary to, or involved an unreasonable application of, clearly established Supreme Court law, or was based on an unreasonable factual determination. Procedurally defaulted claims are generally barred absent cause and actual prejudice or a fundamental miscarriage of justice. The speedy-trial claim was reviewed under the four-factor Barker v. Wingo framework.
PRECEDENTIAL VALUE	Unknown
PARTIES	Rodney Wayne Patterson v. Warden Dewayne Estes

TOPICS

federal habeas corpus post-conviction relief procedural due process sixth amendment speedy trial

PRACTICE AREAS

federal habeas corpus criminal procedure post-conviction relief constitutional law

QUESTIONS PRESENTED

1. Whether Patterson's Sixth Amendment speedy-trial claim was exhausted and, under AEDPA, warranted federal habeas relief.
2. Whether Patterson's ineffective-assistance-of-trial-counsel claim based on counsel's failure to assert a speedy-trial challenge earlier was procedurally defaulted and, if so, whether abandonment by post-conviction counsel established cause and actual prejudice.
3. Whether Patterson's other pro se habeas claims were forfeited, noncognizable because they alleged state-law errors, or procedurally defaulted.

HOLDINGS

1. Patterson exhausted his speedy-trial claim by presenting it through one complete round of Alabama appellate review, but he was not entitled to federal habeas relief because the Alabama Court of Criminal Appeals reasonably applied *Barker v. Wingo* and reasonably determined that the delay was not attributable to intentional or negligent state conduct, that Patterson asserted the right only two days before trial, and that he failed to establish actual prejudice.
2. The ineffective-assistance claim was procedurally defaulted, and Patterson failed to demonstrate actual prejudice sufficient to excuse the default, even assuming that post-conviction counsel's abandonment could constitute cause.
3. The remaining claims were forfeited because Patterson did not address them in his counseled brief; to the extent they alleged state-law errors, they were not cognizable in federal habeas; and to the extent they were unexhausted, they were procedurally defaulted without a showing of actual prejudice.

KEY QUOTATIONS

"Thus, federal habeas courts must apply 'an important 'corollary' to the exhaustion requirement': the doctrine of procedural default." (at 13)

"Because Mr. Patterson 'invok[ed] one complete round of the State's established appellate review process,' Mr. Patterson has exhausted his speedy trial claim, and that claim is not procedurally defaulted." (at 15)

"Based on the record before the ACCA, the ACCA's weighing of the Barker factors was not 'so obviously wrong that its error lies beyond any possibility for fairminded disagreement.'" (at 22)

"Because Mr. Patterson's ineffective assistance of trial counsel claim for failure to raise a speedy trial challenge earlier is procedurally defaulted and because Mr. Patterson cannot show actual prejudice to overcome the default, the Court denies Mr. Patterson's habeas petition." (at 27)

FACTUAL BACKGROUND

Patterson was arrested and indicted in Alabama for attempting to murder Evon Patterson. His trial was delayed for nearly four years amid a separate reckless-endangerment case, bond proceedings, judicial recusals, and changes in the presiding judge. He moved to dismiss for violation of the Sixth Amendment speedy-trial right two days before trial, but the motion was denied. A jury convicted him of attempted murder, and he received a life sentence.

PROCEDURAL HISTORY

Patterson was convicted of attempted murder in the Lawrence County Circuit Court and sentenced to life imprisonment. The Alabama Court of Criminal Appeals affirmed the conviction and sentence, denied rehearing, and the Alabama Supreme Court denied certiorari. Patterson later filed a Rule 32 petition in state court, which was dismissed as untimely; his appeal was dismissed for failure to file a brief. The federal district court denied the § 2254 petition, concluding that the speedy-trial claim had been adjudicated on the merits and that the ineffective-assistance claim was procedurally defaulted without cause and actual prejudice.

DISPOSITION

dismissed

CASES CITED

- Shinn v. Ramirez, 596 U.S. 366 (2022)
- O'Sullivan v. Boerckel, 526 U.S. 838 (1999)
- Dill v. Holt, 371 F.3d 1301 (11th Cir. 2004)
- Barker v. Wingo, 407 U.S. 514 (1972)
- Ex parte Walker, 928 So. 2d 259 (Ala. 2005)
- Zumbado v. State, 615 So. 2d 1223 (Ala. Crim. App. 1993)
- Benefield v. State, 726 So. 2d 286 (Ala. Crim. App. 1997)
- Brown v. State, 392 So. 2d 1248 (Ala. Crim. App. 1980)
- Davis v. Commissioner, Alabama Department of Corrections, 120 F.4th 768 (11th Cir. 2024)
- Ferguson v. Secretary, Florida Department of Corrections, 716 F.3d 1315 (11th Cir. 2013)
- Sears v. Warden GDCP, 73 F.4th 1269 (11th Cir. 2023)
- Harrington v. Richter, 562 U.S. 86 (2011)
- Carruth v. Commissioner, Alabama Department of Corrections, 93 F.4th 1338 (11th Cir. 2024)
- Schlup v. Delo, 513 U.S. 298 (1995)
- Coleman v. Thompson, 501 U.S. 722 (1991)
- Murray v. Carrier, 477 U.S. 478 (1986)
- United States v. Oliva, 909 F.3d 1292 (11th Cir. 2018)
- King v. Warden, Georgia Diagnostic Prison, 69 F.4th 856 (11th Cir. 2023)
- Swarthout v. Cooke, 562 U.S. 216 (2011)

