

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
CALIFORNIA

William D. Lawson Jr. v. B. Cates

Lawson v. Cates · No. 25-cv-06661-SVK · Decided October 16, 2025

SUMMARY

The United States District Court for the Northern District of California transfers a California prisoner’s 28 U.S.C. § 2254 habeas petition to the Eastern District of California. The court holds that venue is proper in the federal district encompassing the county of conviction, Butte County, and orders the Clerk to transfer the case in the interest of justice.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Susan van Keulen
JURISDICTION	United States District Court for the Northern District of California
DECIDED	October 16, 2025
DOCKET	25-cv-06661-SVK
DISPOSITION	other
PROCEDURAL POSTURE	A California state prisoner proceeding pro se filed a petition for a writ of habeas corpus under 28 U.S.C. § 2254 in the Northern District of California, challenging his Butte County Superior Court conviction. The court transferred the petition to the Eastern District of California because Butte County is in that district.
PRECEDENTIAL VALUE	Unpublished district court transfer order; limited precedential value.

TOPICS

- federal habeas corpus
- venue
- post-conviction relief
- civil procedure

PRACTICE AREAS

- Federal habeas corpus
- Federal civil procedure
- Venue and transfer

QUESTIONS PRESENTED

- Whether the Northern District of California should transfer a § 2254 habeas petition challenging a Butte County conviction to the Eastern District of California, the federal district encompassing the county of

conviction.

HOLDINGS

1. Although a state habeas petition may be filed in either the district of confinement or the district of conviction, the district of conviction is the proper venue for a petition challenging the validity of the conviction; because Butte County is in the Eastern District of California, transfer to that district was appropriate.

FACTUAL BACKGROUND

William D. Lawson Jr., a California prisoner proceeding without counsel, challenged the validity of his conviction in Butte County Superior Court through a petition under 28 U.S.C. § 2254. Because Butte County lies within the Eastern District of California, the Northern District of California determined that the district of conviction was the proper venue for the habeas petition.

PROCEDURAL HISTORY

Petitioner filed a federal habeas petition challenging the validity of a conviction entered in Butte County Superior Court. The Northern District of California determined that the district of conviction was the proper venue and ordered transfer to the Eastern District of California in the interest of justice.

DISPOSITION

other

REMAND INSTRUCTIONS

The Clerk was directed to transfer the matter forthwith to the United States District Court for the Eastern District of California.

CASES CITED

- Dannenberg v. Ingle, 831 F. Supp. 767, 768 (N.D. Cal. 1993)
- Laue v. Nelson, 279 F. Supp. 265, 266 (F.D. Cal. 1968)