UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON

German Vazquez v. Derek Sanders

No. 3:25-cv-06131-BJR-DWC, United States District Court for the Western District of Washington (January 12, 2026)

SUMMARY

The United States District Court for the Western District of Washington directs pretrial detainee German Vazquez to show cause or amend his 28 U.S.C. § 2241 habeas petition. The court concludes that Vazquez has not exhausted available Washington state court remedies and has not demonstrated special circumstances warranting federal intervention before trial. Vazquez must respond and file an amended petition by February 11, 2026, or dismissal will be recommended.

CASE DETAILS

COURT	United States District Court for the Western District of Washington
WRITING FOR THE COURT	David W. Christel
JURISDICTION	United States District Court for the Western District of Washington
DECIDED	January 12, 2026
DOCKET	3:25-cv-06131-BJR-DWC
DISPOSITION	other
PROCEDURAL POSTURE	A pretrial detainee filed a federal habeas petition under 28 U.S.C. § 2241 challenging excessive bail and the denial of release on personal recognizance. The court issued an order to show cause or amend, directing petitioner to address exhaustion and file an amended petition.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	German Vazquez v. Derek Sanders

TOPICS

federal habeas corpus · bail · comity · criminal procedure · post-conviction relief

PRACTICE AREAS

Federal habeas corpus · Criminal procedure · Bail · Post-conviction relief

QUESTIONS PRESENTED

1. Whether a federal court may entertain a pretrial detainee's § 2241 habeas claims before the petitioner exhausts available state judicial remedies.
2. Whether the petitioner demonstrated special circumstances warranting federal intervention before completion of the state criminal proceedings.
3. Whether petitioner should be required to show cause for failure to exhaust and file an amended petition.

HOLDINGS

1. Although 28 U.S.C. § 2241(c)(3) does not expressly impose an exhaustion requirement, exhaustion is required as a matter of comity unless special circumstances justify federal intervention before the state criminal trial.
2. Petitioner must show cause why the action should not be dismissed for failure to exhaust state remedies and must file an amended petition if he intends to continue the action.

KEY QUOTATIONS

> *"[A] state prisoner must normally exhaust available state judicial remedies before a federal court will entertain his petition for habeas corpus."* (at 1)

> *"[S]tate prisoners must give the state courts one full opportunity to resolve any constitutional issues by invoking one complete round of the State's established appellate review."* (at 1)

FACTUAL BACKGROUND

German Vazquez was a pretrial detainee housed at the Thurston County Corrections Facility. He alleged that he was being held on excessive bail and had not been released on personal recognizance. He filed a federal habeas petition under 28 U.S.C. § 2241 while state criminal proceedings were ongoing, but did not demonstrate that he had presented his federal claims to the Washington state trial and appellate courts.

PROCEDURAL HISTORY

On December 15, 2025, German Vazquez filed a proposed § 2241 petition while detained at the Thurston County Corrections Facility. The district court referred the action to Magistrate Judge David W. Christel, who determined that the claims appeared unexhausted and ordered petitioner to respond or file an amended pleading by February 11, 2026. The order states that failure to adequately respond would result in a recommendation of dismissal.

DISPOSITION

other

CASES CITED

- Picard v. Connor, 404 U.S. 270, 275 (1971)

- Vasquez v. Hillery, 474 U.S. 254, 257 (1986)
- O'Sullivan v. Boerckel, 526 U.S. 838, 845 (1999)
- Carden v. Montana, 626 F.2d 82, 83-84 (9th Cir. 1980)
- Younger v. Harris, 401 U.S. 37 (1971)

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