

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH
CAROLINA, FLORENCE DIVISION

Eric A. Wigfall, Jr. v. Sheriff Ritchee

Wigfall · No. 4:26-cv-00008-RMG · Decided February 24, 2026

SUMMARY

The United States District Court for the District of South Carolina adopted the magistrate judge’s recommendation and dismissed Eric A. Wigfall, Jr.’s 28 U.S.C. § 2241 habeas petition without prejudice under the Younger abstention doctrine. The court also denied a certificate of appealability and did not require the respondent to file a return.

CASE DETAILS

COURT	United States District Court for the District of South Carolina, Florence Division
WRITING FOR THE COURT	Richard Mark Gergel
JURISDICTION	United States District Court for the District of South Carolina, Florence Division
DECIDED	February 24, 2026
DOCKET	4:26-cv-00008-RMG
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner sought federal habeas relief under 28 U.S.C. § 2241 while detained pending trial in state criminal proceedings. The matter was referred to a magistrate judge, who recommended summary dismissal under Younger abstention without requiring a response from the respondent. After petitioner objected, the district court adopted the Report and Recommendation and dismissed the petition without prejudice.
STANDARD OF REVIEW	The district court makes a de novo determination of portions of a magistrate judge's report and recommendation to which specific objections are made, and may accept, reject, or modify the recommendation. In the absence of specific objections, the court reviews the record for clear error. Pro se pleadings are liberally construed, but liberal construction does not permit the court to disregard a failure to allege facts supporting a viable federal claim.

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QUESTIONS PRESENTED

1. Whether the district court should adopt the magistrate judge's Report and Recommendation when petitioner did not make specific objections.
2. Whether Younger abstention required dismissal of the petitioner's § 2241 habeas petition challenging ongoing state criminal proceedings.
3. Whether petitioner was entitled to a certificate of appealability.

HOLDINGS

1. Because petitioner did not specifically object to any portion of the Report and Recommendation, the district court was required at most to review the record for clear error and properly adopted the recommendation.
2. Younger abstention applies because petitioner was involved in ongoing state criminal proceedings, those proceedings implicated important state interests, and petitioner had an adequate opportunity to raise his federal claims in the state proceedings.
3. A certificate of appealability was denied because petitioner did not make the required substantial showing of the denial of a constitutional right.

KEY QUOTATIONS

“Nevertheless, the Court finds that the Magistrate Judge correctly determined that applying Younger abstention is appropriate here because (1) Petitioner is involved in ongoing state criminal proceedings, (2) those proceedings implicate important state interests, and (3) Petitioner has an adequate opportunity to raise his federal claims in the state proceedings.” (at 3)

“For the foregoing reasons, the Court ADOPTS the R&R (Dkt. No. 8) as the Order of the Court, DISMISSES Petitioner’s habeas petition (Dkt. No. 1) without prejudice and without requiring Respondent to file a return, and DENIES a certificate of appealability.” (at 4)

FACTUAL BACKGROUND

Petitioner was a state detainee awaiting trial on four criminal charges. He filed a petition under 28 U.S.C. § 2241 asking the federal court to investigate the matters underlying his detention and release him from the detention center. The court found that ongoing state criminal proceedings implicated important state interests and provided petitioner an adequate opportunity to raise his federal claims.

PROCEDURAL HISTORY

Eric A. Wigfall, Jr., proceeding pro se, filed a § 2241 petition seeking investigation of his circumstances and release from detention. The magistrate judge recommended dismissal based on Younger abstention. The district court reviewed the recommendation, found no specific objection requiring de novo review, independently determined that Younger abstention applied, adopted the recommendation, dismissed without prejudice, and denied a certificate of appealability.

DISPOSITION

dismissed

CASES CITED

- Younger v. Harris, 401 U.S. 37 (1971)
- Mathews v. Weber, 423 U.S. 261, 270-71 (1976)
- Diamond v. Colonial Life & Accident Ins. Co., 416 F.3d 310, 315 (4th Cir. 2005)
- Cruz v. Beto, 405 U.S. 319, 322 (1972)
- Haines v. Kerner, 404 U.S. 519, 520-21 (1972)
- Weller v. Dep't of Soc. Servs., 901 F.2d 387, 391 (4th Cir. 1990)
- Robinson v. Thomas, 855 F.3d 278, 285 (4th Cir. 2017)
- Robinson v. Thomas, 855 F.3d 278, 286 (4th Cir. 2017)
- Miller-El v. Cockrell, 537 U.S. 322, 336 (2003)
- Slack v. McDaniel, 529 U.S. 473, 484 (2000)
- Rose v. Lee, 252 F.3d 676, 683 (4th Cir. 2001)