

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Fowler v. Ogle

No. 3:25-CV-02180 (M.D. Pa. Mar. 20, 2026) · No. 3:25-cv-02180 · Decided March 20, 2026

SUMMARY

The United States District Court for the Middle District of Pennsylvania dismissed StevieRay Fowler’s pretrial habeas petition under 28 U.S.C. § 2241. The court held that Fowler had not shown exhaustion, a special need, or extraordinary circumstances warranting federal intervention in his pending state criminal proceedings. The court also declined to issue a certificate of appealability.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Karoline Mehalchick
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	March 20, 2026
DOCKET	3:25-cv-02180
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petition for writ of habeas corpus pursuant to 28 U.S.C. § 2241 challenging pretrial detention on state charges
PRECEDENTIAL VALUE	unpublished

TOPICS

- habeas corpus
- federal habeas corpus
- criminal procedure
- exhaustion of remedies

PRACTICE AREAS

- habeas corpus
- criminal procedure
- federal courts

QUESTIONS PRESENTED

- Whether federal habeas corpus relief under 28 U.S.C. § 2241 is available to challenge pretrial detention pending unresolved state criminal charges

HOLDINGS

1. Petitioners seeking habeas corpus relief prior to final conviction and sentence in state court may only obtain such relief if they make a special showing of need and have exhausted state remedies, or if extraordinary circumstances justify relief.

KEY QUOTATIONS

“Petitioners seeking habeas corpus relief prior to final conviction and sentence in state court may only obtain such relief if (a) they make 'a special showing of the need' for habeas corpus relief and have exhausted state court remedies or (b) 'extraordinary circumstances' justify habeas corpus relief.”

FACTUAL BACKGROUND

StevieRay Fowler, incarcerated at York County Prison, sought habeas corpus relief challenging his pretrial detention on a state charge of obstruction in the investigation of child abuse. He was represented by counsel, had been arraigned, had bail set, and was awaiting a pre-trial conference in state court.

PROCEDURAL HISTORY

Petitioner filed a habeas corpus petition challenging his pretrial detention in state court on nine grounds. The district court dismissed the petition.

DISPOSITION

dismissed

CASES CITED

- McFarland v. Scott, 512 U.S. 849 (1994)
- Moore v. DeYoung, 515 F.2d 437 (3d Cir. 1975)
- Braden v. 30th Judicial Cir. Ct. of Kentucky, 410 U.S. 484 (1973)
- Duran v. Thomas, 393 F. App'x 3 (3d Cir. 2010)
- Werkheiser v. Shoemaker, No. 3:25-CV-1068, 2025 WL 1888223 (M.D. Pa. July 8, 2025)
- Torres v. Briggs, No. 1:23-CV-00976, 2023 WL 4553376 (M.D. Pa. July 14, 2023)
- Slack v. McDaniel, 529 U.S. 473 (2000)

OPINION

UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF PENNSYLVANIA STEVIERAY FOWLER, Petitioner CIVIL ACTION NO. 3:25-CV-02180 v. (MEHALCHICK, J.) ADAM OGLE, Respondent. MEMORANDUM StevieRay Fowler, incarcerated at the York County Prison, seeks to challenge his pretrial detention through a writ of habeas corpus pursuant to 28 U.S.C. § 2241. See (Doc. 1). “If it plainly appears from the petition and any attached exhibits that the petitioner is not entitled to relief in the district court, the judge must dismiss the petition and direct the clerk to notify the petitioner.” Rules Governing § 2254 Cases in the United States District

Courts, 28 U.S.C. foll. § 2254, Rule 4 (also applicable to § 2241 petitions under Rule 1(b)); see *McFarland v. Scott*, 512 U.S. 849, 856 (1994) (“Federal courts are authorized to dismiss summarily any habeas petition that appears legally insufficient on its face.”).

I. BACKGROUND AND PROCEDURAL HISTORY Fowler’s petition concerns his detention in the York County Prison pursuant to a charge of obstruction in the investigation of child abuse. See *Commonwealth v. Fowler*, No. CP- 67-CR-0006156-2025 (York Cty. Ct. Com. Pl.); 18 Pa.C.S. § 4958(b). He attempts to challenge his pretrial detention on nine grounds: “Unlawful Detention of the Wrong Person,” “Arrest Warrant Issued for a Non-Existent Entity,” “Fabricated Identity Evidence,” “Coerced Extradition,” “Lack of Personal Jurisdiction,” “No Statutory Basis for § 4958(b) Charge,” “Retaliatory Prosecution,” “Unlawful Compelled Attendance at CYS Hearing,” and “No UCCJEA Jurisdiction in the Underlying Matter.” II.

DISCUSSION Petitioners seeking habeas corpus relief prior to final conviction and sentence in state court may only obtain such relief if (a) they make “a special showing of the need” for habeas corpus relief and have exhausted state court remedies or (b) “extraordinary circumstances” justify habeas corpus relief. *Moore v. DeYoung*, 515 F.2d 437, 443 (3d Cir.

1975) (citing *Braden v. 30th Judicial Cir. Ct. of Kentucky*, 410 U.S. 484 (1973)). This discretionary jurisdiction “must be exercised sparingly in order to prevent... ‘pre-trial habeas interference by federal courts in the normal functioning of state criminal processes.’” *Duran v. Thomas*, 393 F. App’x 3, 4 (3d Cir. 2010) (unpublished) (citing *Moore*, 515 F.2d at 445–46); see also *Werkheiser v. Shoemaker*, No. 3:25-CV-1068, 2025 WL 1888223, at *4 (M.D.

Pa. July 8, 2025) (noting that “some district courts in the Third Circuit decline to consider Section 2241 habeas petitions filed by petitioners with unresolved state criminal charges under *Younger* abstention”). A review of the relevant docket indicates that Fowler is represented by counsel, has been arraigned, has had bail set, and is awaiting a pre-trial conference.

See *Fowler*, No. CP-67- CR-0006156-2025 (York Cty. Ct. Com. Pl.).¹ The petition does not present “extraordinary circumstances” justifying habeas relief, such as bad faith or harassment, but simply lists 1 Fowler attaches two motions that he describes as having been “ignored” by the Magisterial District Court, with no further explanation. See (Doc. 1 at 9); *Commonwealth v. Fowler*, No. MJ-19105-CR-0000372-2025 (M.D.J.

19-1-05). However, it does not appear that Fowler has been denied access to the appropriate state procedures, nor does the petition suggest a “special need” for federal habeas intervention prior to trial. See *Moore*, 515 F.2d at 445-46 (cautioning against the exercise of habeas review to “abort a trial in the state courts” by seeking dismissal of the pending state charges). arguments regarding the underlying charge that could be raised at the appropriate stage of the criminal proceedings.

See, e.g., *Torres v. Briggs*, No. 1:23-CV-00976, 2023 WL 4553376, at *3- 4 (M.D. Pa. July 14, 2023) (citing *Moore*, 515 F.2d at 447 n.12). III. CONCLUSION Accordingly, for the reasons set forth above, Fowler's petition will be dismissed.

Because jurists of reason would not find the procedural disposition of this case debatable, see *Slack v. McDaniel*, 529 U.S. 473, 484 (2000), no certificate of appealability will issue. An appropriate order follows. Dated: March 20, 2026 s/ Karoline Mehalchick KAROLINE MEHALCHICK United States District Judge