

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PRECEDENTIAL VALUE	unpublished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)