

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF  
VIRGINIA, ALEXANDRIA DIVISION

Jamal Antwon Knowles v. Commonwealth of Virginia

No. 1:24cv1290 (RDA/WBP) · No. No. 1:24cv1290 (RDA/WBP) · Decided June 3, 2026

SUMMARY

The United States District Court for the Eastern District of Virginia denied Jamal Antwon Knowles’s Rule 60(b)(4) motion seeking reconsideration or vacatur of the court’s prior denial of his federal habeas petition. The court concluded that the motion largely reargued claims previously considered, including ineffective assistance, actual innocence, and alleged defects concerning access to courts and legal materials. The court also explained that, if construed as a successive habeas petition, the motion would require authorization from the Fourth Circuit, and it declined to issue a certificate of appealability.

CASE DETAILS

|                       |                                                                                                                                                                                                                                |
|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Eastern District of Virginia, Alexandria Division                                                                                                                                         |
| WRITING FOR THE COURT | Rossie D. Alston, Jr.                                                                                                                                                                                                          |
| JURISDICTION          | United States District Court for the Eastern District of Virginia, Alexandria Division                                                                                                                                         |
| DECIDED               | June 3, 2026                                                                                                                                                                                                                   |
| DOCKET                | No. 1:24cv1290 (RDA/WBP)                                                                                                                                                                                                       |
| DISPOSITION           | other                                                                                                                                                                                                                          |
| PROCEDURAL POSTURE    | Petitioner moved under Federal Rule of Civil Procedure 60(b)(4) to reconsider or vacate the court's prior judgment denying his federal habeas petition. The court denied the motion and closed the civil action.               |
| STANDARD OF REVIEW    | A motion under Rule 60(b)(4) may provide relief from a void judgment. The court examined whether the motion was a genuine challenge to the collateral-review process or instead an unauthorized successive habeas application. |
| PRECEDENTIAL VALUE    | unpublished district court memorandum opinion and order                                                                                                                                                                        |
| PARTIES               | Jamal Antwon Knowles v. Commonwealth of Virginia                                                                                                                                                                               |

## TOPICS

federal habeas corpus

successive petitions

motion for reconsideration

post-conviction relief

appellate procedure

## PRACTICE AREAS

federal habeas corpus

post-conviction relief

civil procedure

appellate procedure

## QUESTIONS PRESENTED

1. Whether Knowles's motion constituted a proper Rule 60(b)(4) motion attacking a defect in the federal habeas proceedings or an unauthorized successive habeas petition attacking his conviction.
2. Whether the prior judgment was void under Federal Rule of Civil Procedure 60(b)(4).
3. Whether the district court had jurisdiction to consider the motion if it was construed as a successive habeas petition without authorization from the Fourth Circuit.
4. Whether Knowles was entitled to a certificate of appealability.

## HOLDINGS

1. A motion that directly attacks the prisoner's conviction or sentence, rather than identifying a defect in the collateral-review process, generally constitutes a successive habeas application rather than a proper Rule 60(b) motion.
2. Knowles's prior judgment was not void, and his Rule 60(b)(4) motion was properly denied.
3. When a motion is construed as a successive habeas petition, the district court lacks jurisdiction absent authorization from the court of appeals.
4. The court declined to issue a certificate of appealability.

## KEY QUOTATIONS

*“A motion directly attacking the prisoner’s conviction or sentence will usually amount to a successive application, while a motion seeking a remedy for some defect in the collateral review process will generally be deemed a proper motion to reconsider.”*

*“Accordingly, it is hereby ORDERED that Petitioner’s Rule 60(b) Motion is DENIED, Dkt. Nos. 36 and 37.”*

## FACTUAL BACKGROUND

Knowles, a Virginia inmate proceeding pro se, challenged the validity of his criminal conviction and asserted actual innocence, ineffective assistance of counsel, inadequate access to legal materials and the courts during COVID-19, and a transfer. Those matters had been raised or considered in his prior federal habeas proceedings. His new motion and amended motion largely reargued the merits of claims resolved in the court's July 28, 2025 memorandum opinion.

## PROCEDURAL HISTORY

Knowles previously filed a federal habeas petition under 28 U.S.C. § 2254. In a July 28, 2025 memorandum opinion, the court rejected or denied his claims, including ineffective-assistance claims, a void-conviction claim, and an actual-innocence assertion. Knowles then filed a motion for reconsideration or to vacate judgment, followed by an amended motion, reasserting matters addressed in the prior opinion. The court denied the Rule 60(b) motion and stated that, if construed as a successive habeas petition, it lacked jurisdiction absent authorization from the Fourth Circuit.

## DISPOSITION

other

## CASES CITED

- FTC v. Ross, 74 F.4th 186, 191 (4th Cir. 2023)
- Martinez v. Ryan, 566 U.S. 1 (2012)
- Strickland v. Washington, 466 U.S. 668 (1984)
- Bixby v. Stirling, 90 F.4th 140, 149 (4th Cir. 2023)
- Gonzalez v. Crosby, 545 U.S. 524, 533 (2005)
- United States v. Wright, 276 F. App'x 346, 346 (4th Cir. 2008)
- United States v. Winestock, 340 F.3d 200, 207 (4th Cir. 2003)
- In re Williams, 364 F.3d 235, 238 (4th Cir. 2004)
- Evans v. Smith, 220 F.3d 306, 325 (4th Cir. 2000)

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