

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OHIO

Leonard Jenkins v. Judge James R. Knepp II and Malcolm Heard

Jenkins · No. 1:25 CV 254 · Decided January 6, 2026

SUMMARY

The United States District Court for the Northern District of Ohio overruled Leonard Jenkins’s objections to a magistrate judge’s Report and Recommendation in his 28 U.S.C. § 2254 habeas case. The court held that the petition was second or successive, adopted the Report and Recommendation, granted the motion to transfer, and transferred the petition to the Sixth Circuit for authorization under 28 U.S.C. § 2244(b)(3)(A).

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio
WRITING FOR THE COURT	James R. Knepp II
JURISDICTION	United States District Court for the Northern District of Ohio
DECIDED	January 6, 2026
DOCKET	1:25 CV 254
DISPOSITION	other
PROCEDURAL POSTURE	A state prisoner filed a 28 U.S.C. § 2254 habeas petition. After the magistrate judge recommended transfer to the Sixth Circuit because the petition was second or successive, the district court reviewed the petitioner's objections, adopted the recommendation, granted the motion to transfer, and transferred the petition.
STANDARD OF REVIEW	The district court reviews de novo those portions of a magistrate judge's Report and Recommendation to which specific objections are made, adopts uncontested portions, and reviews general or insufficient objections only for clear error.
PRECEDENTIAL VALUE	Unknown
PARTIES	Leonard Jenkins v. Judge James R. Knepp II, Malcolm Heard

TOPICS

- federal habeas corpus
- successive petitions
- appellate procedure
- standard of review
- post-conviction relief

PRACTICE AREAS

federal habeas corpus

post-conviction relief

appellate procedure

civil procedure

QUESTIONS PRESENTED

1. Whether Jenkins's objections to the magistrate judge's Report and Recommendation were sufficiently specific to trigger de novo review.
2. Whether the present § 2254 petition was a second or successive petition subject to 28 U.S.C. § 2244(b)(3)(A).
3. Whether the district court should transfer the petition to the Sixth Circuit under 28 U.S.C. § 1631.

HOLDINGS

1. Objections that do not address the magistrate judge's recommended disposition and instead merely restate unrelated claims do not constitute proper specific objections requiring de novo review.
2. Because Jenkins had previously filed a § 2254 petition, the present petition was second or successive and had to be transferred to the Sixth Circuit for consideration under 28 U.S.C. § 2244(b)(3)(A).

KEY QUOTATIONS

“A general objection, or one that merely restates the arguments previously presented and addressed by the Magistrate Judge, does not sufficiently identify alleged errors in the [R&R] to trigger de novo review.” (2)

FACTUAL BACKGROUND

Jenkins is a state prisoner serving convictions entered in 1982 for aggravated murder, aggravated robbery, attempted murder, kidnapping, and possession of criminal tools. He previously filed a § 2254 habeas petition in the Northern District of Ohio in 1985. He filed the present § 2254 petition in 2025, and the court determined that it was a second or successive petition requiring authorization from the Sixth Circuit.

PROCEDURAL HISTORY

Jenkins filed the present habeas petition on January 31, 2025. The matter was referred to Magistrate Judge Jennifer Dowdell Armstrong, who recommended transfer to the Sixth Circuit under 28 U.S.C. §§ 1631 and 2244(b)(3)(A). Jenkins objected, but the district court found that his objections did not address the successive-petition or transfer issues, adopted the Report and Recommendation, and transferred the petition.

DISPOSITION

other

CASES CITED

- *Rumsfeld v. Padilla*, 542 U.S. 426, 434-35 (2004)
- *Jenkins v. Morris*, No. 1:85 CV 3707 (N.D. Ohio filed Dec. 9, 1985)

- Hill v. Duriron Co., 656 F.2d 1208, 1213-14 (6th Cir. 1981)
- Cole v. Yukins, 7 F. App'x 354, 356 (6th Cir. 2001)
- Howard v. Secretary of Health & Human Services, 932 F.2d 505, 509 (6th Cir. 1991)
- Fondren v. American Home Shield Corp., 2018 WL 3414322, at *2 (W.D. Tenn.)
- Aldrich v. Bock, 327 F. Supp. 2d 743, 747 (E.D. Mich. 2004)
- Equal Employment Opportunity Commission v. Dolgencorp, LLC, 277 F. Supp. 3d 932, 965 (E.D. Tenn. 2017), aff'd, 899 F.3d 428 (6th Cir. 2018)

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