

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF
MASSACHUSETTS

James Nelson Holloway II v. Warden Bowers

No. 26-10631-IT (D. Mass. Mar. 12, 2026) · No. No. 26-10631-IT · Decided March 12, 2026

SUMMARY

The United States District Court for the District of Massachusetts denied James Nelson Holloway II’s petition for a writ of habeas corpus under 28 U.S.C. § 2241. The court held that Holloway’s pending Sixth Circuit appeal and available competency-restoration proceedings in the Eastern District of Michigan made habeas relief premature. The court also denied his motion to exercise jurisdiction, dismissed the action, and denied his in forma pauperis motion as moot.

CASE DETAILS

COURT	United States District Court for the District of Massachusetts
WRITING FOR THE COURT	Indira Talwani
JURISDICTION	United States District Court for the District of Massachusetts
DECIDED	March 12, 2026
DOCKET	No. 26-10631-IT
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner filed a pro se petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging his pretrial detention for competency evaluation and restoration treatment. The district court conducted preliminary review before service and denied the petition and related motion, dismissing the action as premature.
STANDARD OF REVIEW	Preliminary review of a habeas petition under 28 U.S.C. § 2243 and Rule 4 of the Rules Governing Section 2254 Cases, as applied under Rule 1(b); dismissal is proper when the petition is legally insufficient on its face or the petitioner is plainly not entitled to relief.
PRECEDENTIAL VALUE	Unpublished district court order; nonprecedential
PARTIES	James Nelson Holloway II v. Warden Bowers

TOPICS

- federal habeas corpus
- habeas corpus
- criminal procedure
- post-conviction relief

PRACTICE AREAS

Federal habeas corpus

Criminal procedure

Competency to stand trial

QUESTIONS PRESENTED

1. Whether the District of Massachusetts could entertain a § 2241 petition challenging Holloway's competency evaluation, competency-restoration treatment, and continued detention while an appeal concerning the same order was pending in the Sixth Circuit.
2. Whether habeas relief was premature because the statutory competency proceedings under 18 U.S.C. § 4241 had not concluded.
3. Whether Holloway's motion to exercise jurisdiction and motion to proceed in forma pauperis should be granted.

HOLDINGS

1. A pending appeal in the Sixth Circuit concerning the competency evaluation and treatment order precluded the District of Massachusetts from exercising jurisdiction over the same issues.
2. Habeas relief was premature because the statutory competency proceedings, including treatment and a subsequent determination concerning Holloway's ability to understand the proceedings and assist in his defense, had not concluded.
3. The petition could be dismissed without service because it was legally insufficient for relief at that stage and the petitioner was not presently entitled to habeas relief.

KEY QUOTATIONS

“But where ‘Congress has set up a specific ‘mechanism’ to ‘deal with [such claims]’ . . . ‘federal courts should refrain from entertaining’ a habeas petition raising those very issues, at least until the statutory mechanism has run its course.”

“Until those statutory proceedings are concluded, habeas relief in this court is premature.”

FACTUAL BACKGROUND

A criminal complaint was filed against Holloway in the Eastern District of Michigan, and he was arrested the following day. The magistrate judge ordered a competency evaluation under 18 U.S.C. § 4241(b), later found Holloway incompetent to stand trial, and ordered hospitalization for competency-restoration treatment for up to four months under § 4241(d)(1). Holloway appealed that order to the Sixth Circuit and then filed this § 2241 petition challenging the criminal charges and competency-related detention.

PROCEDURAL HISTORY

Holloway was charged in the Eastern District of Michigan and committed under 18 U.S.C. § 4241 for a competency evaluation. After a magistrate judge found him incompetent to stand trial and ordered competency-restoration treatment, Holloway appealed to the Sixth Circuit. While that appeal was pending, he filed this § 2241 petition in the District of Massachusetts. The court held that the pending appeal and statutory competency

proceedings deprived it of a basis to entertain the petition at that time, denied habeas relief, and dismissed the action.

DISPOSITION

dismissed

CASES CITED

- McFarland v. Scott, 512 U.S. 849, 856 (1994)
- Wiener v. MIB Group, Inc., 86 F.4th 76, 81 n.3 (1st Cir. 2023)
- Law Offices of David Efron v. Matthews & Fullmer Law Firm, 782 F.3d 46, 56 n.7 (1st Cir. 2015)
- Cockerham v. Boncher, 125 F.4th 11, 17 (1st Cir. 2024)
- Boumediene v. Bush, 553 U.S. 723, 793 (2008)
- Burmaster v. Holland, No. 17-6115, 2017 WL 2703648 (4th Cir. June 22, 2017)

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