

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Wayne Taylor III v. Warden

No. 2:25-cv-0398 TLN AC P (E.D. Cal. June 26, 2025) · No. No. 2:25-cv-0398 TLN AC P · Decided June 27,
2025

SUMMARY

The United States District Court for the Eastern District of California denied Wayne Taylor III's motion to disqualify the magistrate judge. The court also resolved outstanding requests concerning access to legal property and law-library resources, concluding that petitioner had mechanisms to obtain his property and access legal resources and had not shown prejudice to his access to the courts. The court found that dissatisfaction with prior adverse rulings was insufficient to establish judicial bias or support recusal.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Allison Claire
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	June 27, 2025
DOCKET	No. 2:25-cv-0398 TLN AC P
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner proceeding pro se in a 28 U.S.C. § 2254 habeas action moved for emergency injunctive relief, access to legal property and law-library resources, appointment of counsel, and disqualification of the magistrate judge. The court addressed the access-related requests and denied the motion to disqualify.
STANDARD OF REVIEW	For recusal under 28 U.S.C. §§ 144 and 455, whether a reasonable person with knowledge of all the facts would conclude that the judge's impartiality might reasonably be questioned. For access-to-courts relief, the petitioner had to demonstrate an imminent or actual injury, including prejudice to existing or contemplated litigation.
PRECEDENTIAL VALUE	Unknown; district court order with no reported citation
PARTIES	Wayne Taylor III v. Warden

TOPICS

federal habeas corpus

injunctions

civil procedure

post-conviction relief

PRACTICE AREAS

federal habeas corpus

prisoner civil rights

judicial disqualification

QUESTIONS PRESENTED

1. Whether Taylor was entitled to emergency injunctive or other relief requiring prison officials to deliver his legal property, replace his tablet, or provide physical access to a law library.
2. Whether Taylor demonstrated an actual or imminent violation of his constitutional right of access to the courts.
3. Whether the magistrate judge should be disqualified or recused based on Taylor's dissatisfaction with prior adverse rulings.

HOLDINGS

1. Taylor was not entitled to further access-related relief because he had a mechanism for obtaining his legal property, access to legal resources through the paging service, and no demonstrated imminent or actual prejudice to his habeas litigation.
2. The motion to disqualify was denied because dissatisfaction with prior adverse judicial rulings is legally insufficient to establish bias or a basis for recusal.

KEY QUOTATIONS

“No particular methodology is required, however; what matters is the ability to challenge one’s sentence or conditions of confinement, not “the capability of turning pages in a law library[.]”” (at 2)

“The alleged bias and prejudice to be disqualifying must stem from an extrajudicial source and result in an opinion on the merits on some basis other than what the judge learned from [her] participation in the case.” (at 4)

FACTUAL BACKGROUND

Taylor was temporarily housed at the California Health Care Facility for medical treatment while remaining assigned to the Substance Abuse Treatment Facility, where his legal property remained. The Warden represented that Taylor could obtain the property by submitting a written request, that his tablet was functioning, and that he could access legal resources through a paging service because his medical condition prevented him from leaving his housing unit. Taylor also challenged the magistrate judge's handling of his prior motions and argued that unfavorable rulings demonstrated bias.

PROCEDURAL HISTORY

Taylor filed a pro se petition for writ of habeas corpus on January 29, 2025. After the court ordered a response, the Warden moved to dismiss. Taylor sought emergency relief, appointment of counsel, access to legal property

and law-library resources, and an extension of time to oppose the motion to dismiss; the court previously denied appointment of counsel, construed the emergency request in part as an access and extension request, and granted additional time. After receiving the Warden's response, Taylor moved to disqualify the magistrate judge, which the court denied.

DISPOSITION

other

CASES CITED

- Lewis v. Casey, 518 U.S. 343, 346 (1996)
- Bounds v. Smith, 430 U.S. 817, 828 (1977)
- Lewis v. Casey, 518 U.S. 343, 349, 356-57 (1996)
- United States v. Studley, 783 F.2d 934, 939-40 (9th Cir. 1986)
- United States v. Azhocar, 581 F.2d 735, 738 (9th Cir. 1978)
- Mayes v. Leipziger, 729 F.2d 605, 607 (9th Cir. 1984)
- Liteky v. United States, 510 U.S. 540, 555 (1994)
- United States v. Grinnell Corp., 384 U.S. 563, 583 (1966)
- United States v. Wilson, 631 F.2d 118, 119 (9th Cir. 1980)