

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Christopher Williams v. Warden, USP-Mendota

Williams v. Warden · No. 1:25-cv-00546-SKO (HC) · Decided September 9, 2025

SUMMARY

The United States District Court for the Eastern District of California construed the respondent’s motion to dismiss as an answer and denied Christopher Williams’s 28 U.S.C. § 2241 habeas petition with prejudice. The court held that Williams’s procedural due process rights were not violated in connection with a prison disciplinary proceeding because he received the required process and ultimately received the disciplinary hearing report. The court directed the clerk to enter judgment and close the case.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Sheila K. Oberto
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	September 9, 2025
DOCKET	1:25-cv-00546-SKO (HC)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Federal prisoner filed a 28 U.S.C. § 2241 petition challenging the loss of good-conduct-time credits arising from a prison disciplinary proceeding. Respondent filed a motion to dismiss and response; the court construed it as an answer, denied the petition with prejudice, and directed entry of judgment.
STANDARD OF REVIEW	The court reviewed the § 2241 petition and administrative record to determine whether the disciplinary proceeding violated the procedural due process guarantees applicable when good-conduct-time credits may be lost.
PRECEDENTIAL VALUE	Unknown; district court opinion with no reporter citation and no stated precedential designation.
PARTIES	Christopher Williams v. Warden, USP-Mendota

TOPICS

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the court had jurisdiction under 28 U.S.C. § 2241 over Williams's challenge to the execution of his federal sentence through the loss of good-conduct-time credits.
2. Whether venue was proper in the Eastern District of California because Williams was confined at FCI-Mendota within the district.
3. Whether Williams was required to exhaust administrative remedies and, if so, whether exhaustion was satisfied or should be excused.
4. Whether Respondent's merits-based motion to dismiss should be construed as an answer rather than treated as a Rule 4 or Rule 12(b)(6) motion.
5. Whether Williams's procedural due process rights were violated when he allegedly did not receive the disciplinary hearing officer report.

HOLDINGS

1. A federal prisoner may use § 2241 to challenge the manner, location, or conditions of execution of a sentence, including the administration of good-conduct-time credits; Williams's challenge therefore fell within the court's habeas jurisdiction.
2. Venue was proper in the Eastern District of California because Williams was in the custody of the Bureau of Prisons at FCI-Mendota, which is located within the district.
3. Federal prisoners generally must exhaust administrative remedies before filing a habeas petition challenging a circumstance of imprisonment, but the requirement is judicially created and nonjurisdictional. The court proceeded to the merits because Respondent did not dispute that Williams had exhausted his claims.
4. Respondent's merits-based motion to dismiss was properly construed as an answer because it addressed the merits and included evidence, rather than functioning as a Rule 4 screening motion or a Rule 12(b)(6) motion.
5. Williams's procedural due process rights were not violated. Although due process requires a written statement of the evidence relied upon and reasons for disciplinary action when good-conduct-time credits may be lost, the record showed that the disciplinary hearing officer report was delivered to Williams and later provided again during administrative review; in any event, Williams demonstrated no prejudice from any delay.

KEY QUOTATIONS

“When a prison disciplinary proceeding may result in the loss of good time credits, due process requires that the prisoner receive the following procedural guarantees: (1) advance written notice of at least 24 hours of the disciplinary charges; (2) an impartial hearing body; (3) an opportunity, when consistent with institutional safety and correctional goals, to call witnesses and present documentary evidence in his defense; and (4) a written statement by the factfinder of the evidence relied on and the reasons for the disciplinary action.”

(Discussion, Review of Petition)

“Respondent’s motion to dismiss is CONSTRUED as an answer;” (Order)

“The petition for writ of habeas corpus is DENIED WITH PREJUDICE;” (Order)

FACTUAL BACKGROUND

On June 11, 2024, prison officials issued an incident report charging Williams with assault causing serious bodily injury and pressuring another inmate for legal documents and information. At a June 18, 2024 disciplinary hearing, Williams did not dispute the charges and pleaded guilty. The disciplinary hearing officer imposed, among other sanctions, a loss of 41 days of good-conduct-time credits. Williams claimed that he was denied a written statement of the evidence relied upon and reasons for the disciplinary action because he did not receive the disciplinary hearing officer report.

PROCEDURAL HISTORY

Williams filed his § 2241 petition on May 8, 2025, alleging that prison disciplinary proceedings violated procedural due process. The court screened the petition and directed Respondent to file an answer. Respondent filed a merits-based motion to dismiss, Williams filed an opposition or traverse, and the court construed Respondent's filing as an answer before denying relief with prejudice.

DISPOSITION

dismissed

CASES CITED

- Brown v. United States, 610 F.2d 672, 677 (9th Cir. 1990)
- Capaldi v. Pontesso, 135 F.3d 1122, 1123 (6th Cir. 1998)
- Kingsley v. Bureau of Prisons, 937 F.2d 26, 30 n.5 (2d Cir. 1991)
- United States v. Jalili, 925 F.2d 889, 893-894 (6th Cir. 1991)
- Clark v. Floyd, 80 F.3d 371, 372, 374 (9th Cir. 1996)
- Barden, 921 F.2d at 479
- Martinez v. Roberts, 804 F.2d 570, 571 (9th Cir. 1986)
- Chua Han Mow v. United States, 730 F.2d 1308, 1313 (9th Cir. 1984)
- Ruviwat v. Smith, 701 F.2d 844, 845 (9th Cir. 1983)
- Brown v. Rison, 895 F.2d 533, 535 (9th Cir. 1990)
- Wolff v. McDonnell, 418 U.S. 539, 555-567 (1974)

- Bostic v. Carlson, 884 F.2d 1267, 1269 (9th Cir. 1989)
- Superintendent, Mass. Corr. Inst. v. Hill, 472 U.S. 445, 454-455 (1984)
- Patterson v. Bolster, 2020 WL 520588, at *6 (E.D. Va. Jan. 31, 2020)
- Jones v. Smith, 2006 WL 1222923, at *2 (E.D. Cal. May 5, 2006)

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