

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WASHINGTON

Jeremy Daniel Manning v. State of Washington

Manning · No. 2:25-cv-02237-DGE-BAT · Decided January 23, 2026

SUMMARY

The United States District Court for the Western District of Washington adopted a magistrate judge’s report and recommendation and dismissed Jeremy Daniel Manning’s habeas petition without prejudice. The court held that Younger abstention required it to refrain from interfering with Manning’s pending state criminal proceedings and independently concluded that the petition failed because Manning did not challenge the lawfulness of his current federal detention. The court denied a certificate of appealability and denied Manning’s motion for reassignment as moot.

CASE DETAILS

COURT	United States District Court for the Western District of Washington
WRITING FOR THE COURT	David G. Estudillo
JURISDICTION	United States District Court for the Western District of Washington
DECIDED	January 23, 2026
DOCKET	2:25-cv-02237-DGE-BAT
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner objected to a magistrate judge's report and recommendation recommending dismissal without prejudice of his habeas petition under the Younger abstention doctrine and denial as moot of his motion for reassignment.
STANDARD OF REVIEW	The district court reviewed de novo the portions of the report and recommendation to which specific objections were made under 28 U.S.C. § 636(b)(1)(C) and Federal Rule of Civil Procedure 72(b)(3). For nonspecific objections, the court stated that it would review the record for clear error.
PRECEDENTIAL VALUE	Unpublished district court order; persuasive rather than precedential.
PARTIES	Jeremy Daniel Manning v. State of Washington

TOPICS

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the district court was required to abstain under *Younger* from interfering with Manning's ongoing state criminal proceedings.
2. Whether Manning could obtain habeas relief under 28 U.S.C. §§ 2241 or 2254 when he did not challenge the legality of his current detention.
3. Whether Manning demonstrated bad faith, harassment, or an extraordinary circumstance sufficient to avoid *Younger* abstention.
4. Whether Manning's motion for reassignment should be denied as moot.

HOLDINGS

1. Federal courts must abstain from interfering with Manning's ongoing state criminal proceeding because all four *Younger* requirements were satisfied: an ongoing state-initiated proceeding, an important state interest, no demonstrated procedural bar to raising federal claims in state court, and a federal action that would enjoin or practically interfere with the state proceeding.
2. Manning failed to establish bad faith, harassment, or another extraordinary circumstance that would permit a federal court to intervene in the pending state proceeding.
3. The habeas petition failed under both 28 U.S.C. § 2254 and § 2241 because Manning was not alleged to be in custody pursuant to a state-court judgment and did not allege that his current federal detention violated the Constitution or federal law.
4. A certificate of appealability was denied because Manning did not make a substantial showing of the denial of a constitutional right.

KEY QUOTATIONS

“The Younger abstention doctrine mandates that federal courts must generally abstain from interfering in a parallel, pending state criminal proceeding.” (at 3)

“The bad faith exception does not come into play simply because the state might have brought a weak case against a defendant.” (at 5)

“At present, there is no basis to grant a writ of habeas corpus.” (at 6)

FACTUAL BACKGROUND

Manning had criminal charges pending in both the Western District of Washington and King County Superior Court, and he was detained at the Federal Detention Center in SeaTac. His habeas petition challenged the manner in which the state charges were investigated and prosecuted, asserting claims including fabricated evidence,

prosecutorial misconduct, destruction of exculpatory evidence, denial of speedy-trial rights, and outrageous government conduct. The petition did not allege that his current federal detention resulted from a state-court judgment or that his current detention violated federal law.

PROCEDURAL HISTORY

Manning filed a habeas petition challenging the prosecution and investigation of pending state criminal charges, along with a motion to assign the matter to the district judge presiding over his federal criminal case. Magistrate Judge Brian A. Tsuchida recommended abstention and dismissal without prejudice and recommended denying the reassignment motion as moot. After reviewing Manning's timely objections de novo, the district court adopted the report and recommendation in full, dismissed the petition without prejudice, denied a certificate of appealability, and denied reassignment as moot.

DISPOSITION

dismissed

CASES CITED

- White v. Lambert, 370 F.3d 1002, 1007 (9th Cir. 2004)
- Hayward v. Marshall, 603 F.3d 546 (9th Cir. 2010)
- Amaro v. Ryan, 2012 WL 12702, at *1 (D. Ariz. Jan. 4, 2012)
- Brandon v. Dep't of Corr., 2021 WL 5937685, at *1 (W.D. Wash. Dec. 16, 2021)
- Venson v. Jackson, 2019 WL 1531271, at *1 (S.D. Cal. Apr. 8, 2019)
- Sprint Commc'ns, Inc. v. Jacobs, 571 U.S. 69, 72 (2013)
- Younger v. Harris, 401 U.S. 37, 43-54 (1971)
- Drury v. Cox, 457 F.2d 764, 764-765 (9th Cir. 1972)
- San Jose Silicon Valley Chamber of Com. Pol. Action Comm. v. City of San Jose, 546 F.3d 1087, 1092 (9th Cir. 2008)
- Kelly v. Robinson, 479 U.S. 36, 49 (1986)
- Commc'ns Telesystems Int'l v. Cal. Pub. Utility Comm'n, 196 F.3d 1011, 1020 (9th Cir. 1999)
- Pennzoil Co. v. Texaco, Inc., 481 U.S. 1, 15 (1987)
- Logue v. Guyer, 2020 WL 1921962, at *1 (D. Mont. Apr. 21, 2020)
- Johnson v. Fitial, 2012 WL 12542689, at *5 (D. N. Mar. I. Sept. 26, 2012)
- Middlesex Cnty. Ethics Comm'n v. Garden State Bar Ass'n, 457 U.S. 423, 435 (1982)
- Gibson v. Schmidt, 522 F. Supp. 3d 804, 816 (D. Or. 2021)
- Wilson v. Belleque, 554 F.3d 816, 825 (9th Cir. 2009)

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