

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
MISSISSIPPI, SOUTHERN DIVISION

Michael Shane Steiner v. Sheriff John Ledbetter

Steiner · No. 1:25cv21-HSO-BWR · Decided March 2, 2026

SUMMARY

The United States District Court for the Southern District of Mississippi denied a certificate of appealability in Michael Shane Steiner’s habeas corpus case. The court concluded that reasonable jurists could not debate the procedural dismissal or the determination that the petition failed to state a valid constitutional claim.

CASE DETAILS

COURT	United States District Court for the Southern District of Mississippi, Southern Division
WRITING FOR THE COURT	Halil Suleyman Ozerden
JURISDICTION	United States District Court for the Southern District of Mississippi, Southern Division
DECIDED	March 2, 2026
DOCKET	1:25cv21-HSO-BWR
DISPOSITION	cert_denied
PROCEDURAL POSTURE	The federal district court denied a certificate of appealability following a final order adverse to the habeas petitioner and dismissal of the petition on procedural grounds.
STANDARD OF REVIEW	A certificate of appealability should issue only if reasonable jurists could debate whether the petition states a valid claim of the denial of a constitutional right and, when the district court dismissed on procedural grounds, whether the procedural ruling is debatable or incorrect.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Michael Shane Steiner v. Sheriff John Ledbetter

TOPICS

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

PRACTICE AREAS

federal habeas corpus

post-conviction relief

appellate procedure

QUESTIONS PRESENTED

1. Whether the petitioner was entitled to a certificate of appealability after the habeas petition was dismissed on procedural grounds.

HOLDINGS

1. A certificate of appealability should not issue because reasonable jurists could not debate whether the court's procedural dismissal was debatable or incorrect or whether the petition stated a valid claim of the denial of a constitutional right.

KEY QUOTATIONS

“Jurists of reason could not conclude that the Court’s dismissal on procedural grounds was debatable or incorrect or that the petition states a valid claim of the denial of a constitutional right.” (at 1)

FACTUAL BACKGROUND

The opinion concerns a federal habeas corpus petition in which the petitioner challenged detention arising from state-court process or proceedings under 28 U.S.C. § 2241. The district court had entered a final order adverse to the petitioner and dismissed the matter on procedural grounds.

PROCEDURAL HISTORY

Steiner filed a habeas corpus petition in federal district court. After the court entered a final adverse order dismissing the petition on procedural grounds, the court considered whether to issue a certificate of appealability and denied one.

DISPOSITION

cert_denied

CASES CITED

- Slack v. McDaniel, 529 U.S. 473, 484 (2000)