

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Garcia v. Warden Taylor

Garcia · No. 1:24-cv-01044-SAB-HC · Decided April 15, 2025

SUMMARY

The United States District Court for the Eastern District of California recommends granting the respondent’s motion to dismiss a federal prisoner’s 28 U.S.C. § 2241 petition. The court concludes that the petitioner had already received the maximum First Step Act earned time credits, that the Second Chance Act is not an additional source of time credits, and that the court lacked jurisdiction over the challenged length of halfway-house placement.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Stanley A. Boone
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	April 15, 2025
DOCKET	1:24-cv-01044-SAB-HC
DISPOSITION	dismissed
PROCEDURAL POSTURE	Federal habeas petitioner proceeding pro se under 28 U.S.C. § 2241; respondent moved to dismiss, and the magistrate judge issued findings and a recommendation to grant the motion and dismiss the petition, subject to review by an assigned district judge.
STANDARD OF REVIEW	The recommendation would be reviewed by the assigned district judge under 28 U.S.C. § 636(b)(1)(C) and Local Rule 304. The court also applied Article III's case-or-controversy requirement and the pleading standard for a cognizable § 2241 claim.
PRECEDENTIAL VALUE	unpublished
PARTIES	John Garcia IV v. Warden Taylor

TOPICS

- federal habeas corpus
- subject matter jurisdiction
- post-conviction relief
- administrative law

PRACTICE AREAS

federal habeas corpus

prisoner litigation

administrative law

QUESTIONS PRESENTED

1. Whether Garcia's First Step Act earned-time-credit claim remained a live case or controversy after the Bureau of Prisons awarded him the statutory maximum of 365 days of credits.
2. Whether the Second Chance Act provides an additional source of earned time credits.
3. Whether Garcia stated a cognizable federal habeas claim by challenging the length of his residential reentry center or halfway-house placement.
4. Whether the district court had jurisdiction to review the Bureau of Prisons' discretionary determination concerning the length of Garcia's residential reentry center placement.

HOLDINGS

1. The First Step Act claim was moot because Garcia had received the remedy requested: the statutory maximum of 365 days of First Step Act earned time credits.
2. The Second Chance Act is not an additional source of earned time credits.
3. The petition did not state a cognizable federal habeas claim to the extent it challenged only the Bureau of Prisons' discretionary determination that Garcia receive a ninety-day residential reentry center placement, and the district court lacked jurisdiction over that length-of-placement challenge.

KEY QUOTATIONS

“This case-or-controversy requirement subsists through all stages of federal judicial proceedings”
(Discussion, Part II.A)

“The SCA is not, however, ‘an additional source of time credits.’” (Discussion, Part II.B)

“The Second Chance Act does not guarantee a one-year RRC placement, but only directs the Bureau of Prisons to consider placing an inmate in a RRC for up to the final twelve months of his or her sentence.”
(Discussion, Part II.B)

FACTUAL BACKGROUND

Garcia, a federal prisoner, alleged that the Bureau of Prisons had not applied all of his First Step Act and Second Chance Act earned time credits. He also challenged the Bureau's determination that he would be placed in a halfway house for ninety days. The record showed that he had already been awarded the statutory maximum of 365 days of First Step Act earned time credits toward early release to supervised release.

PROCEDURAL HISTORY

Garcia filed a § 2241 petition alleging that the Bureau of Prisons failed to apply all First Step Act and Second Chance Act earned time credits and challenging his ninety-day halfway-house placement. Respondent moved to

dismiss. Garcia filed no opposition, and the magistrate judge recommended granting the motion and dismissing the petition, while directing the Clerk to randomly assign a district judge.

DISPOSITION

dismissed

CASES CITED

- Bottinelli v. Salazar, 929 F.3d 1196, 1197–98 (9th Cir. 2019)
- Lewis v. Continental Bank Corp., 494 U.S. 472, 477 (1990)
- Spencer v. Kemna, 523 U.S. 1, 7 (1998)
- Sacora v. Thomas, 628 F.3d 1059, 1061–62 (9th Cir. 2010)
- Tong v. Derr, No. CV 22-00543 JAO-WRP, 2023 WL 3996982, at *8 (D. Haw. June 14, 2023)
- Untalan v. Derr, No. CV 23-00091 JMS-RT, 2023 WL 2868519, at *4 (D. Haw. Apr. 10, 2023)
- Lovett v. Hogsten, No. 09-5605, 2009 WL 5851205, at *2 (6th Cir. Dec. 29, 2009)
- Reeb v. Thomas, 636 F.3d 1224, 1227 (9th Cir. 2011)
- Jiau v. Tews, 812 F. App'x 638, 639 (9th Cir. 2020)
- Rodriguez v. Copenhaver, 823 F.3d 1238, 1242 (9th Cir. 2016)
- Close v. Thomas, 653 F.3d 970, 973–74 (9th Cir. 2011)
- Wilkerson v. Wheeler, 772 F.3d 834, 839 (9th Cir. 2014)
- Baxter v. Sullivan, 923 F.2d 1391, 1394 (9th Cir. 1991)