

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
ALABAMA, SOUTHERN DIVISION

Hines v. Headley, et al.

Hines · No. 1:24-cv-323-RAH-KFP · Decided April 8, 2026

SUMMARY

The court denied Mark Anthony Hines's petition for a writ of habeas corpus under 28 U.S.C. § 2254 and dismissed the case without prejudice for failure to exhaust state-court remedies. The court also concluded that Hines's claim for monetary damages was not cognizable in a habeas proceeding and denied a certificate of appealability.

CASE DETAILS

COURT	United States District Court for the Middle District of Alabama, Southern Division
WRITING FOR THE COURT	R. Austin Huffaker, Jr.
JURISDICTION	United States District Court for the Middle District of Alabama, Southern Division
DECIDED	April 8, 2026
DOCKET	1:24-cv-323-RAH-KFP
DISPOSITION	dismissed
PROCEDURAL POSTURE	Federal habeas corpus petition under 28 U.S.C. § 2254 following state criminal proceedings and an unappealed denial of a state motion for new trial.
STANDARD OF REVIEW	The court reviewed the § 2254 petition and state-court record for facial legal sufficiency and determined whether the claims had been exhausted through one complete round of Alabama appellate review.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Mark Anthony Hines v. Joseph Headley, et al.

TOPICS

- federal habeas corpus
- state post-conviction relief
- post-conviction relief
- damages
- remedies

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Hines's sentence-related claims were unexhausted because he did not present them through one complete round of Alabama appellate review.
2. Whether monetary damages for alleged unlawful detention and abuse are available through a federal habeas corpus petition.
3. Whether the petition should be dismissed without prejudice without an evidentiary hearing and without issuing a certificate of appealability.

HOLDINGS

1. A § 2254 petitioner must fairly present the substance of his federal claims to the state courts through one complete round of the state's established appellate review process. Because Hines did not raise or pursue either claim through direct review or Alabama Rule 32 proceedings and the required appeals, his claims were unexhausted.
2. Monetary damages are not an available habeas corpus remedy, so Hines's damages claim was legally insufficient on its face.
3. A federal court may summarily dismiss a habeas petition that is legally insufficient on its face; the petition was denied without an evidentiary hearing.

KEY QUOTATIONS

“A petitioner must exhaust state court remedies before seeking relief through a federal habeas corpus petition.” (text)

“Damages are not an available habeas remedy.” (text)

“Hines did not appeal to the Alabama appellate courts or through a post-conviction petition for collateral review under Rule 32 of the Alabama Rules of Criminal Procedure.” (text)

FACTUAL BACKGROUND

On June 12, 2020, Hines pleaded guilty to unlawful possession of a controlled substance and abuse of a corpse and received concurrent ten-year and fifteen-year sentences. After his release to non-custodial supervision, he was arrested for another unlawful-possession offense, pleaded guilty on March 18, 2024, and received a six-year concurrent sentence. He filed a motion for new trial that was summarily denied and not appealed, then filed a federal § 2254 petition seeking concurrent sentence calculations and \$188,000 in damages.

PROCEDURAL HISTORY

Hines pleaded guilty in Alabama state court to unlawful possession of a controlled substance and abuse of a corpse and received concurrent sentences. After a later guilty plea and sentence for another unlawful-possession charge, he filed a state motion for new trial, which was summarily denied and not appealed. He then filed and amended a § 2254 petition asserting sentence-related claims and seeking monetary damages. The district court

denied the petition without an evidentiary hearing and dismissed it without prejudice for failure to exhaust state remedies; it also concluded that damages are unavailable in habeas proceedings and denied a certificate of appealability.

DISPOSITION

dismissed

CASES CITED

- Duncan v. Henry, 513 U.S. 364, 365 (1995)
- Picard v. Connor, 404 U.S. 270, 275 (1971)
- Castille v. Peoples, 489 U.S. 346, 349 (1989)
- Lucas v. Sec’y, Dep’t of Corrs., 682 F.3d 1342, 1353 (11th Cir. 2012)
- Anderson v. Harless, 459 U.S. 4, 6 (1982)
- O’Sullivan v. Boerckel, 526 U.S. 838, 845 (1999)
- Ward v. Hall, 592 F.3d 1144, 1156 (11th Cir. 2010)
- Pruitt v. Jones, 348 F.3d 1355, 1359 (11th Cir. 2003)
- Smith v. Jones, 256 F.3d 1135, 1140-41 (11th Cir. 2001)
- Dill v. Holt, 371 F.3d 1301, 1303 (11th Cir. 2004)
- Wrenn v. Toney, No. 21-13337-E, 2022 WL 966398, at *1 (11th Cir. Feb. 10, 2022)
- McFarland v. Scott, 512 U.S. 849, 856 (1994)
- Esslinger v. Davis, 44 F.3d 1515, 1524 (11th Cir. 1995)
- Nelson v. Campbell, 541 U.S. 637, 646 (2004)
- Preiser v. Rodriguez, 411 U.S. 475, 494 (1973)