

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
PENNSYLVANIA

Paul Callahan v. Kevin Ransom, et al.

Callahan · No. Civil Action No. 22-1824 · Decided February 27, 2026

SUMMARY

The United States District Court for the Eastern District of Pennsylvania reviewed Paul Callahan’s pro se petition for habeas corpus relief under 28 U.S.C. § 2254. The court approved the magistrate judge’s Report and Recommendation, concluding that the claims were procedurally defaulted and that the petition should be denied. The opinion addresses exhaustion, procedural default, actual innocence, ineffective assistance of counsel, and related constitutional claims.

CASE DETAILS

COURT	United States District Court for the Eastern District of Pennsylvania
WRITING FOR THE COURT	Cynthia M. Rufe
JURISDICTION	United States District Court for the Eastern District of Pennsylvania
DECIDED	February 27, 2026
DOCKET	Civil Action No. 22-1824
DISPOSITION	other
PROCEDURAL POSTURE	Federal habeas corpus proceeding under 28 U.S.C. § 2254. The petitioner objected to a magistrate judge's Report and Recommendation recommending that the petition be denied in part and dismissed in part.
STANDARD OF REVIEW	Under AEDPA, relief is unavailable on a claim adjudicated on the merits in state court unless the state decision was contrary to, or involved an unreasonable application of, clearly established United States Supreme Court precedent, or was based on an unreasonable determination of the facts. Procedurally defaulted claims may not be reviewed absent cause and prejudice or a fundamental miscarriage of justice. Review of objections to a magistrate judge's Report and Recommendation was conducted after full briefing.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Paul Callahan v. Kevin Ransom, et al.

TOPICS

federal habeas corpus post-conviction relief successive petitions actual innocence appellate procedure

PRACTICE AREAS

federal habeas corpus post-conviction relief criminal procedure appellate procedure constitutional law

QUESTIONS PRESENTED

1. Whether Callahan's federal habeas claims were unexhausted and procedurally defaulted under independent and adequate Pennsylvania procedural rules.
2. Whether alleged ineffective assistance by PCRA counsel constituted cause to excuse procedural default under *Martinez v. Ryan*.
3. Whether Callahan satisfied the Schlup actual-innocence gateway by presenting new, reliable evidence showing that no reasonable juror would have convicted him.
4. Whether claims first raised in a reply traverse were waived.
5. Whether Callahan was entitled to an evidentiary hearing, discovery, or appointment of counsel in the § 2254 proceeding.

HOLDINGS

1. Callahan's unexhausted claims were procedurally defaulted because Pennsylvania's PCRA timeliness bar and applicable appellate-waiver rules constituted independent and adequate state-law grounds, and no further state-court review was realistically available.
2. Callahan failed to establish cause and prejudice under *Martinez v. Ryan* because the underlying ineffective-assistance claims lacked merit; therefore, PCRA counsel's alleged failures did not excuse procedural default.
3. Callahan did not satisfy the actual-innocence gateway because the asserted evidence was either not new, not reliable, or insufficient to show that it was more likely than not that no reasonable juror would have convicted him.
4. Claims first raised in Callahan's reply traverse, including new Brady, ineffective-assistance, due-process, and actual-innocence theories, were waived and could not be considered on the merits.
5. Callahan was not entitled to an evidentiary hearing, discovery, or appointment of counsel.

KEY QUOTATIONS

"Mr. Callahan's claims are procedurally defaulted, so they will be dismissed. Accordingly, his Petition for a Writ of Habeas Corpus will be denied." (Conclusion)

"It is not more likely than not that no reasonable juror would have convicted him in light of the new evidence." (III.D)

FACTUAL BACKGROUND

Following a 2015 jury trial, Callahan was convicted of multiple offenses involving the sexual assault of his three minor stepdaughters. The prosecution presented testimony from all three victims, testimony from a sexual-assault nurse examiner, and DNA evidence including a partial profile consistent with Callahan on one swab. Callahan's defense consultant identified potential weaknesses in the Commonwealth's DNA analysis, but she did not testify at trial. Callahan later challenged the convictions through direct appeal, PCRA proceedings, and federal habeas proceedings.

PROCEDURAL HISTORY

Callahan was convicted after a jury trial in the Bucks County Court of Common Pleas and received a sentence that was later reduced on reconsideration. The Pennsylvania Superior Court granted relief on his sexually violent predator designation but otherwise denied his direct appeal, and the Pennsylvania Supreme Court denied review. His first PCRA petition was dismissed as untimely, and the state courts denied relief; a second PCRA petition was also dismissed as untimely. Callahan then filed and amended this § 2254 petition. The magistrate judge recommended dismissal of all claims, and the district court approved the recommendation, dismissed the claims as procedurally defaulted, and denied habeas relief.

DISPOSITION

other

CASES CITED

- Commonwealth v. Callahan, No. 1381 EDA 2020, 2021 WL 4119559 (Pa. Super. Ct. Sept. 9, 2021)
- Commonwealth v. Callahan, 273 A.3d 505 (Pa. 2022)
- Commonwealth v. Callahan, No. 2569 EDA 2023, 2024 WL 4824167 (Pa. Super. Ct. Nov. 19, 2024)
- Brady v. Maryland, 373 U.S. 83 (1963)
- Schlup v. Delo, 513 U.S. 289 (1995)
- Schlup v. Delo, 513 U.S. 298 (1995)
- Wallace v. Mahanoy, 2 F.4th 123 (3d Cir. 2021)
- Strickland v. Washington, 466 U.S. 668 (1984)
- Martinez v. Ryan, 566 U.S. 1 (2012)
- O'Sullivan v. Boerckel, 526 U.S. 838, 845 (1999)
- Lambert v. Blackwell, 387 F.3d 210, 233-34 (3d Cir. 2004)
- Lambert v. Blackwell, 134 F.3d 506, 518-19 (3d Cir. 1997)
- Werts v. Vaughn, 228 F.3d 178, 192 (3d Cir. 2000)
- Coleman v. Thompson, 501 U.S. 722, 749 (1991)
- Edwards v. Carpenter, 529 U.S. 446, 451 (2000)
- Szuchon v. Lehman, 273 F.3d 199, 327 (3d Cir. 2001)
- Leake v. Dillman, 594 F. App'x 756, 759 (3d Cir. 2014)
- Beard v. Kindler, 558 U.S. 53, 60-61 (2009)

- Commonwealth v. Simpson, 66 A.3d 253, 274 (Pa. 2013)
- Lam v. Kelchner, 304 F.3d 256, 271 (3d Cir. 2002)
- United States v. Walker, 155 F.3d 180, 188 (3d Cir. 1998)
- United States v. Vaghari, 500 F. App'x 139, 145-46 (3d Cir. 2012)
- United States v. Ford, 618 F. Supp. 2d 368, 393 (E.D. Pa. 2009)
- Bracy v. Gramley, 520 U.S. 899, 904 (1997)

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