

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH
CAROLINA

Steve Jenkins v. M.V. Joseph, Warden

Jenkins · No. 1:25-cv-12574-JFA-SVH · Decided March 2, 2026

SUMMARY

The United States District Court for the District of South Carolina adopts a Magistrate Judge’s Report and Recommendation and grants the Respondent’s motion for summary judgment. The court denies Steve Jenkins’s habeas petition under 28 U.S.C. § 2241, which sought restoration of good-time credit revoked following a prison disciplinary proceeding. The court also denies a certificate of appealability.

CASE DETAILS

COURT	United States District Court for the District of South Carolina
WRITING FOR THE COURT	Joseph F. Anderson, Jr.
JURISDICTION	United States District Court for the District of South Carolina
DECIDED	March 2, 2026
DOCKET	1:25-cv-12574-JFA-SVH
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner sought habeas corpus relief under 28 U.S.C. § 2241 challenging the revocation of good-time credit following a prison disciplinary proceeding. The matter was referred to a magistrate judge, who recommended dismissal and summary judgment for Respondent. The district court overruled Petitioner's specific objection, adopted the Report and Recommendation, granted Respondent's motion for summary judgment, denied the petition, and denied a certificate of appealability.
STANDARD OF REVIEW	The district court conducts de novo review of portions of a magistrate judge's Report and Recommendation to which a specific written objection is made, and clear-error review of unobjected-to portions or portions challenged only by general and conclusory objections. The court may accept, reject, or modify the recommendation under 28 U.S.C. § 636(b).
PRECEDENTIAL VALUE	unpublished

TOPICS

federal habeas corpus

summary judgment

post-conviction relief

civil procedure

PRACTICE AREAS

Federal habeas corpus

Prisoner litigation

Civil procedure

QUESTIONS PRESENTED

1. Whether the district court properly reviewed and adopted the magistrate judge's Report and Recommendation in light of Jenkins's objections.
2. Whether Jenkins was entitled to habeas relief restoring good-time credit revoked after a prison disciplinary proceeding.
3. Whether Jenkins's assertion that prison staff failed to comply with a daily-mail-collection requirement justified or excused his disciplinary infraction.
4. Whether Jenkins was entitled to a certificate of appealability.

HOLDINGS

1. A district court must conduct de novo review of the specific portions of a magistrate judge's Report and Recommendation to which a specific written objection is made, while unobjected-to portions and portions subject only to general or conclusory objections are reviewed for clear error.
2. Jenkins was not entitled to habeas relief because undisputed evidence showed that his good-time credit was revoked after a fair adjudication of his disciplinary action.
3. A certificate of appealability was denied because Jenkins failed to make a substantial showing of the denial of a constitutional right.

KEY QUOTATIONS

“A specific objection to the Magistrate Judge’s Report thus requires more than a reassertion of arguments from the complaint or a mere citation to legal authorities.”

“A review of the Report shows that the Magistrate Judge correctly concluded Petitioner is not entitled to habeas relief given the undisputed evidence showing his good time credit was revoked after a fair adjudication of his disciplinary action.”

FACTUAL BACKGROUND

Jenkins, a federal prisoner, sought restoration of good-time credit revoked after a disciplinary infraction involving pressing a duress button. He argued that the infraction should be excused because he was attempting to contact prison officials about legal mail and because Bureau of Prisons staff allegedly failed to comply with a

handbook requirement concerning daily mail collection. The record contained undisputed evidence that the credit was revoked after a fair adjudication of the disciplinary charge.

PROCEDURAL HISTORY

Jenkins filed a § 2241 petition seeking restoration of good-time credit removed as punishment for a prison infraction. The magistrate judge conducted initial review of Respondent's motion to dismiss or alternatively for summary judgment and issued a Report and Recommendation concluding that the claim lacked merit. Jenkins objected, Respondent replied, and the district court conducted de novo review of the specifically objected-to portions and clear-error review of the remainder before adopting the Report.

DISPOSITION

other

CASES CITED

- Mathews v. Weber, 423 U.S. 261 (1976)
- Carniewski v. West Virginia Board of Probation & Parole, 974 F.2d 1330 (4th Cir. 1992)
- Camby v. Davis, 718 F.2d 198, 199 (4th Cir. 1983)
- Diamond v. Colonial Life & Accident Insurance Co., 416 F.3d 310, 315-16 (4th Cir. 2005)
- Dunlap v. TM Trucking of the Carolinas, LLC, No. 0:15-cv-04009-JMC, 2017 WL 6345402, at *5 n.6 (D.S.C. Dec. 12, 2017)
- One Parcel of Real Property Known as 2121 E. 30th St., 73 F.3d 1057, 1059 (10th Cir. 1996)
- Workman v. Perry, No. 6:17-cv-00765-RBH, 2017 WL 4791150, at *1 (D.S.C. Oct. 23, 2017)
- Orpiano v. Johnson, 687 F.2d 44, 47 (4th Cir. 1982)
- Staley v. Norton, No. 9:07-0288-PMD, 2007 WL 821181, at *1 (D.S.C. Mar. 2, 2007)
- Howard v. Secretary of Health and Human Services, 932 F.2d 505, 509 (6th Cir. 1991)
- Miller-El v. Cockrell, 537 U.S. 322, 336 (2003)
- Slack v. McDaniel, 529 U.S. 473, 484 (2000)
- Rose v. Lee, 252 F.3d 676, 683 (4th Cir. 2001)