

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Parveg Ahmed v. M.J. Bayless

Ahmed · No. Civ. No. DLB-24-3589 · Decided March 30, 2026

SUMMARY

The United States District Court for the District of Maryland denied the respondent’s motion for summary judgment in Parveg Ahmed’s 28 U.S.C. § 2241 petition. Ahmed sought credit under 18 U.S.C. § 3585(b) for 73 days spent in foreign custody before his federal arrest and sentencing. The court held that the record did not establish that the time had been credited against another sentence and contained genuine factual disputes concerning the basis for his foreign detention.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Deborah L. Boardman
JURISDICTION	United States District Court for the District of Maryland
DECIDED	March 30, 2026
DOCKET	Civ. No. DLB-24-3589
DISPOSITION	denied
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging the Bureau of Prisons' calculation of sentence credit; respondent moved to dismiss or, alternatively, for summary judgment.
STANDARD OF REVIEW	Summary judgment is appropriate when there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The court views facts and reasonable inferences in the light most favorable to the nonmoving party and may not weigh the evidence.
PRECEDENTIAL VALUE	Unknown; memorandum opinion from a federal district court.
PARTIES	Parveg Ahmed v. M.J. Bayless

TOPICS

- federal habeas corpus
- sentencing
- statutory interpretation
- summary judgment
- criminal procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the respondent was entitled to summary judgment on Ahmed's § 2241 petition challenging the Bureau of Prisons' refusal to credit 73 days of foreign official detention toward his federal sentence.
2. Whether 18 U.S.C. § 3585(b) requires credit for prior official detention when the detention resulted either from the offense of conviction or from an arrest for another charge occurring after the commission of the offense of conviction, provided the time was not credited against another sentence.
3. Whether the record established that Ahmed's foreign detention was not official detention or that the time had been credited against another sentence.

HOLDINGS

1. Summary judgment for the respondent was improper because the record contained genuine disputes concerning the basis for Ahmed's foreign detention and did not establish that the 73 days had been credited against another sentence.
2. Under the plain text of § 3585(b), prior official detention must be credited toward a federal sentence if it resulted either from the offense for which the sentence was imposed or from an arrest for any other charge occurring after the commission of that offense, so long as the time was not credited against another sentence.
3. A federal prisoner may use a petition under 28 U.S.C. § 2241 to challenge the Bureau of Prisons' execution or calculation of the prisoner's sentence.

KEY QUOTATIONS

“So, under a plain reading of § 3585(b), prior time spent in official custody (not credited toward another sentence) shall be credited toward the defendant’s sentence if the official custody resulted from the conduct for which the defendant was sentenced or if the official custody resulted from an arrest for “any other charge” that occurred “after” the conduct for which the defendant was sentenced.” (Discussion)

“Thus, the Court finds that the respondent has failed to meet her burden of establishing that Ahmed is not entitled to receive credit under 18 U.S.C. § 3585(b) for time spent in official detention.” (Conclusion)

FACTUAL BACKGROUND

Ahmed was arrested in Jordan on June 16, 2017, and remained in foreign custody for approximately 73 days before being transferred to U.S. custody on August 28, 2017. He later pleaded guilty in the Eastern District of New York to attempting to provide material support to a foreign terrorist organization and received a 153-month sentence. The Bureau of Prisons credited him for 1,940 days of federal pretrial custody but refused to credit the foreign detention because it had not confirmed that the time had not been credited against another sentence. The record contained conflicting evidence about whether the foreign detention was related to the offense of conviction, but no evidence established that the detention had been credited against another sentence.

PROCEDURAL HISTORY

Ahmed filed a § 2241 petition seeking credit for 73 days spent in foreign custody before his arrest by U.S. authorities. Respondent moved to dismiss or for summary judgment, asserting that the Bureau of Prisons correctly refused to award the credit. Because matters outside the pleadings were presented and considered, the court treated the motion as one for summary judgment and denied it, scheduling a status call to address next steps.

DISPOSITION

denied

CASES CITED

- Laughlin v. Metro. Wash. Airports Auth., 149 F.3d 253, 260-61 (4th Cir. 1998)
- Bonnie v. Dunbar, 157 F.4th 610, 613 (4th Cir. 2025)
- Perkins v. Int'l Paper Co., 936 F.3d 196, 205 (4th Cir. 2019)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248-51 (1986)
- Teamsters Joint Council No. 83 v. Centra, Inc., 947 F.2d 115, 119 (4th Cir. 1991)
- Celotex Corp. v. Catrett, 477 U.S. 317, 322-23 (1986)
- Evans v. Techs. Applications & Serv. Co., 80 F.3d 954, 958 (4th Cir. 1996)
- United States v. Jackson, 952 F.3d 492, 497-98 (4th Cir. 2020)
- United States v. Wilson, 503 U.S. 329, 334 (1992)
- Jones v. Hendrix, 599 U.S. 465, 475 (2023)
- Ramirez v. Mansukhani, 619 F. App'x 237 (4th Cir. 2015)
- DeHart v. Streeval, No. 18-74-HRW, 2019 WL 4169878 (E.D. Ky. Sept. 3, 2019)
- Al-Marri v. Davis, 714 F.3d 1183, 1187 (10th Cir. 2013)
- United States v. Aslan, 644 F.3d 526, 532 (7th Cir. 2011)
- Franklin v. Craig, No. 5:08-CV-00312, 2011 WL 2604779, at *2-*3 (S.D.W. Va. June 30, 2011)

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