

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK

Andrew Pridgen v. Warden Solomon Chester, NYC Dept. of Correction

No. 25-CV-5935 (RER) (MMH) (E.D.N.Y. Feb. 23, 2026) · No. No. 25-CV-5935 (RER) (MMH) · Decided February 23, 2026

SUMMARY

The Eastern District of New York dismissed Andrew Pridgen’s habeas petition under 28 U.S.C. §§ 2241 and 2254 without prejudice. The court held that Pridgen was a pretrial detainee, had not exhausted available state remedies, and that his ongoing state criminal proceeding independently warranted abstention under *Younger v. Harris*. The court also denied a certificate of appealability and in forma pauperis status for any appeal.

CASE DETAILS

COURT	United States District Court for the Eastern District of New York
WRITING FOR THE COURT	Ramón E. Reyes, Jr.
JURISDICTION	United States District Court for the Eastern District of New York
DECIDED	February 23, 2026
DOCKET	No. 25-CV-5935 (RER) (MMH)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se state pretrial detainee filed a federal habeas petition under 28 U.S.C. §§ 2241 and 2254 challenging an ongoing Queens County criminal proceeding on speedy-trial and due-process grounds and challenging an impending involuntary commitment. The district court dismissed the petition without prejudice.
STANDARD OF REVIEW	Under Rule 4 of the Rules Governing Section 2254 Cases, the court may summarily review and deny a petition when it plainly appears from the petition and attached exhibits that the petitioner is not entitled to relief. Pro se pleadings are construed liberally, but pro se litigants remain subject to applicable procedural and substantive rules.
PRECEDENTIAL VALUE	unpublished

PARTIES

Andrew Pridgen v. Warden Solomon Chester, NYC Department of Correction

TOPICS

federal habeas corpus

habeas corpus

speedy trial

due process

federalism

PRACTICE AREAS

federal habeas corpus

criminal procedure

constitutional law

post-conviction relief

QUESTIONS PRESENTED

1. Whether a state pretrial detainee may obtain habeas relief under 28 U.S.C. § 2254 when he is not in custody pursuant to a state-court judgment.
2. Whether a state pretrial detainee may obtain relief under 28 U.S.C. § 2241 without exhausting available state court or administrative remedies.
3. Whether the court should abstain under *Younger v. Harris* from adjudicating constitutional challenges to an ongoing state criminal proceeding.
4. Whether Pridgen's claims concerning speedy trial, due process, and involuntary commitment were sufficiently exhausted.

HOLDINGS

1. A petitioner who was a pretrial detainee and was not in custody pursuant to a state-court judgment could not seek habeas relief under 28 U.S.C. § 2254.
2. A state pretrial detainee generally must exhaust available state court or administrative remedies before seeking federal habeas relief under § 2241.
3. Pridgen was not entitled to § 2254 relief because he had not exhausted available state remedies and did not establish either statutory exception to exhaustion.
4. Even if Pridgen could establish cause and prejudice excusing exhaustion, the court would deny the petition under *Younger v. Harris* because the state criminal proceeding was pending and provided an adequate opportunity for review of his constitutional claims.

KEY QUOTATIONS

“The Court cannot consider Pridgen’s petition under section 2241 or section 2254.”

*“Even if [Pridgen] could show cause for his failure to exhaust and prejudice resulting to him from the alleged violation of federal law, the petition is denied pursuant to *Younger v. Harris*, 401 U.S. 37, 54 (1971).”*

FACTUAL BACKGROUND

Pridgen was detained on 2022 criminal charges in Queens County and was a pretrial detainee when he filed the federal petition. He alleged that his speedy-trial rights had been violated and that he would be, or had been,

transferred to a mental-health facility without due process. The record did not establish whether his state criminal case remained pending or had been resolved, but the court found that the proceeding was pending when the petition was filed and that Pridgen had not presented his federal claims to the state courts.

PROCEDURAL HISTORY

Pridgen filed the petition on October 21, 2025 while detained at Otis Bantum Correctional Center on Rikers Island. He later submitted a letter raising ineffective-assistance concerns and stating that he was awaiting transfer to Kirby Psychiatric Center. The court determined that he was a pretrial detainee, had not exhausted available state remedies, and that his pending state criminal proceeding independently implicated Younger abstention. The petition was denied without prejudice under both §§ 2241 and 2254.

DISPOSITION

dismissed

CASES CITED

- *Acosta v. Artuz*, 221 F.3d 117, 123 (2d Cir. 2000)
- *Johnson v. New York*, No. 12-CV-03213 (RRM), 2012 WL 2861004, at *1 (E.D.N.Y. July 11, 2012)
- *Nieves v. Farber*, No. 20 Civ. 0990 (LJL), 2020 WL 1529454, at *3 (S.D.N.Y. Mar. 30, 2020)
- *Triestman v. Fed. Bureau of Prisons*, 470 F.3d 471, 474 (2d Cir. 2006)
- *Williams v. Kullman*, 722 F.2d 1048, 1050 (2d Cir. 1983)
- *McCrary v. Cty. of Nassau*, 493 F. Supp. 2d 581, 584 (E.D.N.Y. 2007)
- *O'Sullivan v. Boerckel*, 526 U.S. 838, 842 (1999)
- *Buthy v. Commissioner of Office of Mental Health of New York State*, 818 F.2d 1046, 1051 (2d Cir. 1987)
- *United States ex rel. Scranton v. State of New York*, 532 F.2d 292, 294 (2d Cir. 1976)
- *Allen v. Maribal*, No. 11-CV-2638 (KAM), 2011 WL 3162675, at *1, *3 (E.D.N.Y. July 25, 2011)
- *Johnson v. Schneider*, 20-CV-888 (JLS), 2020 WL 4905361, at *3 (W.D.N.Y. Aug. 18, 2020)
- *Robinson v. Sposato*, No. CV-11-0191 (SJF), 2012 WL 1965631, at *2-*3 (E.D.N.Y. May 29, 2012)
- *Younger v. Harris*, 401 U.S. 37, 54 (1971)
- *Ramirez v. Attorney Gen. of State of N.Y.*, 280 F.3d 87, 94 (2d Cir. 2001)
- *Coppedge v. United States*, 369 U.S. 438, 444-45 (1962)