UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE

Thomas Edwards v. TransUnion, LLC

Edwards v. TransUnion · No. 2:25-cv-02334-TLP-tmp · Decided December 15, 2025

SUMMARY

The United States District Court for the Western District of Tennessee adopts a magistrate judge's report and recommendation in Thomas Edwards's Fair Credit Reporting Act action against TransUnion, LLC. The court finds that the complaint fails to plausibly state a claim under 15 U.S.C. § 1681e(b) because its allegations are conclusory, but grants Edwards thirty days to amend. The court warns that failure to amend may result in dismissal for failure to prosecute.

CASE DETAILS

COURT	United States District Court for the Western District of Tennessee
WRITING FOR THE COURT	Thomas L. Parker
JURISDICTION	United States District Court for the Western District of Tennessee
DECIDED	December 15, 2025
DOCKET	2:25-cv-02334-TLP-tmp
DISPOSITION	other
PROCEDURAL POSTURE	The district court reviewed a magistrate judge's report and recommendation screening a pro se complaint filed in forma pauperis under 28 U.S.C. § 1915(e)(2). No objections were filed. The district court adopted the report and recommendation and granted Plaintiff thirty days to amend his complaint.
STANDARD OF REVIEW	Clear-error review of an unobjected-to magistrate judge's report and recommendation under Federal Rule of Civil Procedure 72(b) and 28 U.S.C. § 636(b)(1).
PRECEDENTIAL VALUE	Unknown; district court order with no published reporter citation
PARTIES	Thomas Edwards v. TransUnion, LLC

TOPICS

credit reporting · consumer protection · pleadings · civil procedure

PRACTICE AREAS

consumer protection · credit reporting · civil procedure

QUESTIONS PRESENTED

1. Whether the district court should adopt an unobjected-to magistrate judge's report and recommendation after reviewing it for clear error.
2. Whether Plaintiff's conclusory allegations plausibly stated a claim under 15 U.S.C. § 1681e(b).
3. Whether Plaintiff should be granted leave to amend rather than have the complaint dismissed at the screening stage.

HOLDINGS

1. When a party does not object to a magistrate judge's report and recommendation within the prescribed period, the district court reviews the recommendation for clear error.
2. Plaintiff failed to plausibly state a claim under § 1681e(b) because his allegations were conclusory and merely restated an element of the claim without supplying supporting facts.
3. Plaintiff should be granted leave to amend his complaint instead of having the action dismissed at that stage.

KEY QUOTATIONS

> *"If the parties do not object, the district court reviews the R&R for clear error."* (Legal Standard)

> *"To state a claim under section 1681e(b), a plaintiff must show: "(1) the defendant reported inaccurate information about the plaintiff; (2) the defendant either negligently or willfully failed to follow reasonable procedures to assure maximum possible accuracy of the information about the plaintiff; (3) the plaintiff was injured; and (4) the defendant's conduct was the proximate cause of the plaintiff's injury.""* (PageID 18)

FACTUAL BACKGROUND

Thomas Edwards, proceeding pro se, sued TransUnion alleging violations of the Fair Credit Reporting Act. He specifically asserted that TransUnion violated 15 U.S.C. § 1681e(b) by failing to maintain reasonable procedures to assure the maximum possible accuracy of information about him. The district court found that the allegations were conclusory and did not plausibly state a claim, but agreed that Plaintiff should be given leave to amend.

PROCEDURAL HISTORY

Plaintiff filed an action alleging that TransUnion violated the Fair Credit Reporting Act, including 15 U.S.C. § 1681e(b), and moved to proceed in forma pauperis. The motion was granted, and Chief Magistrate Judge Tu M. Pham screened the complaint and recommended that Plaintiff be allowed to amend rather than have the action dismissed. Plaintiff did not object, so the district court reviewed the recommendation for clear error, found none, adopted it, and directed Plaintiff to amend within thirty days.

DISPOSITION

other

REMAND INSTRUCTIONS

Plaintiff must amend his claim within thirty days from entry of the order. If he fails to amend timely, the court may dismiss the claim under Federal Rule of Civil Procedure 41 for failure to prosecute.

CASES CITED

- Twumasi-Ankrah v. Checkr, Inc., 954 F.3d 938, 941 (6th Cir. 2020)
- Taylor v. Experian, No. 23-506, 2023 WL 5214689, at *4 (S.D. Ohio Aug. 15, 2023)
- Edwards v. National Credit Adjusters, LLC (NCA), No. 2:25-cv-02326-TLP-tmp (W.D. Tenn.)
- Edwards v. Opensky Capital Bank NA, No. 2:25-cv-02328-TLP-tmp (W.D. Tenn.)
- Edwards v. FinWise Bank, No. 2:25-cv-02332-TLP-tmp (W.D. Tenn.)
- Edwards v. First Premier Bank, No. 2:25-cv-02336-TLP-tmp (W.D. Tenn.)

INSTRUCTIONS FOR AN AI ASSISTANT

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