

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH
CAROLINA, CHARLESTON DIVISION

Steven Eddington v. South Carolina Department of Corrections, Lt.
James Williams, Lt. Gadsen, Captain Doe, A.W. Bailey, Warden
Cohen, A.W. Washington, Mrs. Shuler, Lt. Becker, Major Fennell, Lt.
Boles, Mrs. Allen, and Officer Mandigo

Eddington · No. 2:25-12571-MGL-MGB · Decided April 23, 2026

SUMMARY

The United States District Court for the District of South Carolina adopts a magistrate judge’s Report and Recommendation and dismisses Steven Eddington’s claims against the South Carolina Department of Corrections with prejudice. The court notes that Eddington filed no objections and provides notice of his right to appeal within thirty days.

CASE DETAILS

COURT	United States District Court for the District of South Carolina, Charleston Division
WRITING FOR THE COURT	Mary Geiger Lewis
JURISDICTION	United States District Court for the District of South Carolina, Charleston Division
DECIDED	April 23, 2026
DOCKET	2:25-12571-MGL-MGB
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court reviewed a magistrate judge's Report and Recommendation recommending dismissal with prejudice of Eddington's claims against the South Carolina Department of Corrections. Eddington filed no objections.
STANDARD OF REVIEW	Because no timely objections were filed, the district court reviewed the Report and Recommendation for clear error rather than conducting de novo review. Specific objections would have required de novo review of the challenged portions under 28 U.S.C. § 636(b)(1).
PRECEDENTIAL VALUE	Unknown; district court order adopting a Report and Recommendation, with no reporter citation identified.

PARTIES

Steven Eddington v. South Carolina Department of Corrections, Lt. James Williams, Lt. Gadsen, Captain Doe, A.W. Bailey, Warden Cohen, A.W. Washington, Mrs. Shuler, Lt. Becker, Major Fennell, Lt. Boles, Mrs. Allen, Officer Mandigo

TOPICS

section 1983 civil procedure standard of review appellate procedure sovereign immunity

PRACTICE AREAS

civil rights litigation prisoner litigation federal civil procedure

QUESTIONS PRESENTED

1. Whether the district court should review the unobjected-to Report and Recommendation for clear error rather than de novo.
2. Whether the Report and Recommendation dismissing Eddington's claims against the South Carolina Department of Corrections with prejudice should be adopted.

HOLDINGS

1. When a party fails to file timely objections to a magistrate judge's Report and Recommendation, the district court need not conduct de novo review and need only satisfy itself that there is no clear error on the face of the record before accepting the recommendation.
2. The court adopted the magistrate judge's Report and Recommendation and dismissed with prejudice Eddington's claims against the South Carolina Department of Corrections.
3. A party's failure to file timely objections to a magistrate judge's Report and Recommendation waives appellate review.

KEY QUOTATIONS

“[I]n the absence of a timely filed objection, a district court need not conduct a de novo review, but instead must ‘only satisfy itself that there is no clear error on the face of the record in order to accept the recommendation.’” (unpaginated)

FACTUAL BACKGROUND

Steven Eddington, a state prisoner, filed a pro se civil-rights action under 42 U.S.C. § 1983 against the South Carolina Department of Corrections and multiple prison personnel. The magistrate judge recommended dismissing the claims against the Department with prejudice and separately authorized service on the individual defendants. Eddington did not object to the Report and Recommendation.

PROCEDURAL HISTORY

Eddington, a state prisoner proceeding pro se, filed a 42 U.S.C. § 1983 action against the South Carolina Department of Corrections and various individual prison personnel. The magistrate judge issued a Report and Recommendation on March 19, 2026, recommending dismissal with prejudice as to the Department, while separately authorizing summonses for the individual defendants. The district court adopted the Report and Recommendation and dismissed the claims against the Department with prejudice; the claims against the individual defendants were not dismissed by this order.

DISPOSITION

dismissed

CASES CITED

- Mathews v. Weber, 423 U.S. 261, 270 (1976)
- Diamond v. Colonial Life & Accident Insurance Co., 416 F.3d 310, 315 (4th Cir. 2005)
- Wright v. Collins, 766 F.2d 841, 845-46 (4th Cir. 1985)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/state/united-states-district-court-for-the-district-of-south-carolina-charleston-division-united-states-di/2026/steven-eddington-v-south-carolina-department-of-corrections-4l3cpse0>