

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH
CAROLINA, ANDERSON/GREENWOOD DIVISION

Nathaniel Simmons v. Officer J. Grinnell, individually and in his
official capacity; City of Williamston

Simmons · No. 8:25-cv-09697-JDA · Decided December 5, 2025

SUMMARY

The United States District Court for the District of South Carolina reviews a magistrate judge’s recommendation concerning Nathaniel Simmons’s § 1983 claims against a police officer and the City of Williamston. The court declines to apply Younger abstention because it could not confirm that the related traffic proceedings remained ongoing, but dismisses the amended complaint without prejudice, without leave to amend, and without issuance or service of process for failure to state a plausible constitutional claim.

CASE DETAILS

COURT	United States District Court for the District of South Carolina, Anderson/Greenwood Division
WRITING FOR THE COURT	Jacquelyn D. Austin
JURISDICTION	United States District Court for the District of South Carolina, Anderson/Greenwood Division
DECIDED	December 5, 2025
DOCKET	8:25-cv-09697-JDA
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court reviewed a magistrate judge's Report and Recommendation recommending summary dismissal of the amended complaint without issuance or service of process and without leave to amend. Plaintiff filed objections, requiring de novo review of the objected-to portions.
STANDARD OF REVIEW	De novo review of portions of the Report and Recommendation to which specific objections were made; clear-error review in the absence of specific objections. The court also applied the Rule 8 plausibility standard to the amended complaint.
PRECEDENTIAL VALUE	unpublished district court opinion; precedential status unknown

TOPICS

section 1983 municipal liability first amendment civil procedure motions to dismiss

PRACTICE AREAS

civil rights constitutional law civil procedure municipal liability remedies

QUESTIONS PRESENTED

1. Whether Younger abstention required dismissal of claims related to traffic charges pending in Williamston Municipal Court.
2. Whether the amended complaint plausibly stated claims under 42 U.S.C. § 1983 for Fourth Amendment unlawful detention, First Amendment retaliation, municipal liability, or malicious prosecution.
3. Whether Plaintiff should receive further leave to amend.

HOLDINGS

1. The court declined to accept the recommendation that Younger abstention required dismissal because the record did not establish that the traffic charges were still ongoing.
2. The amended complaint failed to state a plausible claim for relief under 42 U.S.C. § 1983.
3. Further leave to amend was denied because Plaintiff had already amended the complaint and further amendment would be futile.

KEY QUOTATIONS

“Accordingly, this action is *DISMISSED* without issuance or service of process, without leave to amend,³ and without prejudice.” (Opinion text)

FACTUAL BACKGROUND

Plaintiff alleged that Officer J. Grinnell unlawfully detained him beyond the scope of a routine traffic stop, retaliated against him for exercising free-speech rights, and that the City of Williamston failed to train and supervise its officers. Plaintiff also asserted a malicious-prosecution theory and relied on an internal-affairs investigation disposition as support for municipal liability. The court concluded that the pleaded facts did not plausibly establish the required constitutional violations or a municipal policy or custom.

PROCEDURAL HISTORY

Plaintiff filed an amended complaint asserting claims under 42 U.S.C. § 1983 against Officer Grinnell and the City of Williamston based on a traffic stop, alleged retaliation, and alleged municipal failure to train and supervise. The magistrate judge recommended dismissal based on Younger abstention and failure to state a plausible constitutional claim. After de novo review, the district court declined to rely on Younger abstention because it could not confirm that the state traffic charges remained ongoing, but accepted the recommendation on the alternative ground that the amended complaint failed to state a plausible claim. The action was dismissed without prejudice, without issuance or service of process, and without leave to amend.

DISPOSITION

dismissed

CASES CITED

- Young v. City of Mount Ranier, 238 F.3d 567, 572 (4th Cir. 2001)
- Mathews v. Weber, 423 U.S. 261, 270–71 (1976)
- Diamond v. Colonial Life & Accident Ins., 416 F.3d 310, 315 (4th Cir. 2005)
- Younger v. Harris, 401 U.S. 37 (1971)
- Martin Marietta Corp. v. Md. Comm’n on Hum. Rels., 38 F.3d 1392, 1396 (4th Cir. 1994)
- Evans v. Chalmers, 703 F.3d 636, 647 (4th Cir. 2012)

OPINION

Nathaniel Simmons v. Officer J. Grinnell, individually and in his official capacity; City of Williamston

PER CURIAM.

IN THE DISTRICT COURT OF THE UNITED STATES

FOR THE DISTRICT OF SOUTH CAROLINA

ANDERSON/GREENWOOD DIVISION

Nathaniel Simmons,) Case No. 8:25-cv-09697-JDA) Plaintiff,))

v.) OPINION AND ORDER

) Officer J. Grinnell, individually and in) his official capacity; City of) Williamston,))
Defendant.) This matter is before the Court on Plaintiff’s Amended Complaint and a Report and
Recommendation (“Report”) of the Magistrate Judge. [Docs. 6; 10.] In accordance with 28 U.S.C.
§ 636(b) and Local Civil Rule 73.02(B)(2), D.S.C., this matter was referred to United States
Magistrate Judge William S. Brown for pre-trial proceedings. The Clerk docketed Plaintiff’s
Amended Complaint on August 8, 2025.¹ [Doc. 6.] On August 13, 2025, the Magistrate Judge
issued a Report and Recommendation (“Report”) recommending that this action be dismissed
without issuance and service of process and without leave to amend. [Doc. 10.] The Magistrate
Judge advised the parties of the procedures and requirements for filing objections to the Report
and the serious consequences if they failed to do so. [Id. at 18.] On August 25, 2025, the Clerk
docketed objections to the Report from Plaintiff. [Doc. 12.] ¹ The Amended Complaint replaces
Plaintiff’s prior Complaint. See Young v. City of Mount Ranier, 238 F.3d 567, 572 (4th Cir. 2001)
 (“As a general rule, an amended pleading ordinarily supersedes the original and renders it of no
 legal effect.” (internal quotation marks omitted)); [see also Doc. 1]. The Magistrate Judge makes
 only a recommendation to this Court. The recommendation has no presumptive weight, and the
 responsibility to make a final determination remains with the Court. See Mathews v. Weber, 423
 U.S. 261, 270–71

(1976). The Court is charged with making a de novo determination of any portion of the Report of the Magistrate Judge to which a specific objection is made. The Court may accept, reject, or modify, in whole or in part, the recommendation made by the Magistrate Judge or recommit the matter to the Magistrate Judge with instructions. See 28 U.S.C. § 636(b). The Court will review the Report only for clear error in the absence of an objection. See *Diamond v. Colonial Life & Accident Ins.*, 416 F.3d 310, 315 (4th Cir. 2005) (stating that “in 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” (internal quotation marks omitted)). The Report recommends summary dismissal of the Amended Complaint based on the Younger abstention doctrine “[t]o the extent Plaintiff’s claims are brought to challenge the charges pending against him in the Williamston Municipal Court” [Doc. 10 at 6]; see *Younger v. Harris*, 401 U.S. 37 (1971). In addition, the Report recommends summary dismissal of the Amended Complaint because Plaintiff “has not alleged facts to establish a claim upon which relief can be granted for a constitutional violation under § 1983.” [Doc. 10 at 8.] In his objections, Plaintiff argues that Younger does not bar his claims because he “does not seek to overturn or interfere with any state traffic proceeding”; rather, he “seeks damages under . . . § 1983 for independent constitutional violations committed during the stop itself.” [Doc. 12 at 1.] To this end, Plaintiff claims “state traffic proceedings do not provide a full and adequate opportunity to litigate complex federal claims. . . .” [Id. at 2.] Regarding the Magistrate Judge’s conclusion that the Amended Complaint fails to state a claim for relief, Plaintiff contends that the Magistrate Judge “improperly applied a higher standard than Rule 8 [of the Federal Rules of Civil Procedure] requires” and failed to construe the Amended Complaint liberally. [Id.] Finally, Plaintiff claims that “the proper remedy would be to permit further amendment rather than dismiss outright.” [Id.] The Court has conducted a de novo review of the Report, the record, and the applicable law. As an initial matter, the Court declines to accept the Report’s conclusions regarding Younger abstention, as the pertinent traffic infraction no longer appears on the Anderson County Tenth Judicial Circuit Public Index. See generally <https://publicindex.sccourts.org/Anderson/PublicIndex/PISearch.aspx> (last visited Dec. 4, 2025) (search by case number 9102P0706965). Accordingly, the Court cannot confirm that the charges against Simmons are still ongoing, as required by Younger. See *Marietta Corp. v. Md. Comm’n on Hum. Rels.*, 38 F.3d 1392, 1396 (4th Cir. 1994). Nevertheless, the Court accepts the Report on alternate grounds: the Amended Complaint fails to state a plausible claim for relief under § 1983. In his objections, Plaintiff points to the following facts in his Amended Complaint purporting to state a claim: “(i) Officer J. Grinnell unlawfully detained Plaintiff beyond the scope of a routine traffic stop, violating the Fourth Amendment; (ii) Plaintiff was retaliated against for exercising free speech rights, violating the First Amendment; and (iii) the City of Williamston failed to properly train and supervise its officers, giving rise to municipal liability” [Doc. 12 at 2.] However, as the Magistrate Judge explained in detail, such facts do not facially satisfy the elements of Plaintiff’s constitutional claims.² [Doc. 10 at 8–17.] In

conclusion, the Court accepts the Report and Recommendation of the Magistrate Judge and incorporates it by reference to the extent consistent with this Order. Accordingly, this action is DISMISSED without issuance or service of process, without leave to amend,³ and without prejudice. IT IS SO ORDERED. s/ Jacquelyn D. Austin United States District Judge December 5, 2025 Greenville, South Carolina 2 To the extent Plaintiff asserts a claim for malicious prosecution, the Court declines to accept the Magistrate Judge's Report on the grounds that "Plaintiff has not alleged facts showing that the criminal proceedings ended without a conviction." [Doc. 10 at 12.] That said, Plaintiff's malicious prosecution claim would still fail because Plaintiff does not plausibly allege Officer Grinnell seized him without probable cause. See *Evans v. Chalmers*, 703 F.3d 636, 647 (4th Cir. 2012) (stating the elements of a constitutional claim for malicious prosecution). Further, Plaintiff's submission of the Williamston Police Department's Internal Affairs Investigation Disposition does not cure the deficiencies in his Amended Complaint regarding municipal liability. [See Doc. 12-3; Doc. 12-2 at 1 ("The letter is directly relevant to Plaintiff's claims, particularly his Monell claim against the City of Williamston, as it demonstrates the City's policy and practice of excusing misconduct and failing to discipline officers even after complaints are filed.").] In particular, the disposition does not show any predicate constitutional violation under the First or Fourth Amendments. [See Doc. 10 at 16.] Moreover, a single disposition cannot demonstrate a policy or custom of consistent misconduct. [See *id.* at 17.] ³ In his objections, Plaintiff seeks further leave to amend. [Doc. 12 at 2.] However, as the Magistrate Judge concluded, "Plaintiff . . . already filed an Amended Complaint," and "[f]urther leave to amend would be futile." [Doc. 10 at 17 n.5.]

NOTICE OF RIGHT TO APPEAL

Plaintiff is hereby notified of the right to appeal this order pursuant to Rules 3 and 4 of the Federal Rules of Appellate Procedure.