

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PRECEDENTIAL VALUE	unpublished district court opinion; precedential status unknown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)

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