

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH
CAROLINA

M-EDIF, Members of EDIF; W. MJ Boyd, Founder also known as
Wanda Boyd v. Donald J. Trump, President, et al.

M-EDIF · No. 2:26-1467-RMG · Decided May 6, 2026

SUMMARY

The United States District Court for the District of South Carolina dismisses without prejudice and without issuance or service of process a pro se plaintiff's action brought on behalf of Sean Combs. The court adopts the magistrate judge's recommendation that the claims are frivolous but declines at this time to impose a pre-filing injunction, while warning that future sanctions may be considered.

CASE DETAILS

COURT	United States District Court for the District of South Carolina
WRITING FOR THE COURT	Richard Mark Gergel
JURISDICTION	United States District Court for the District of South Carolina
DECIDED	May 6, 2026
DOCKET	2:26-1467-RMG
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court reviewed a magistrate judge's Report and Recommendation recommending dismissal without prejudice and without issuance and service of process, together with a pre-filing injunction. Plaintiff filed no objections.
STANDARD OF REVIEW	De novo review of portions of a magistrate judge's report and recommendation to which specific objections are made; the district court may accept, reject, modify, or recommit the recommendation under 28 U.S.C. § 636(b)(1).
PRECEDENTIAL VALUE	unpublished district court opinion; precedential status unknown
PARTIES	M-EDIF, Members of EDIF; W. MJ Boyd, Founder also known as Wanda Boyd v. Donald J. Trump, President, et al.

TOPICS

pleadings

civil procedure

civil rights

sanctions

injunctions

PRACTICE AREAS

civil procedure

civil rights

pro se litigation

sanctions

QUESTIONS PRESENTED

1. Whether the action should be dismissed without prejudice and without issuance and service of process as frivolous.
2. Whether the court should impose a pre-filing injunction based on Plaintiff's purported representative filing and pattern of frivolous litigation.

HOLDINGS

1. The action was clearly frivolous and was properly dismissed without prejudice and without issuance and service of process.
2. A pro se litigant may not pursue the action in a representative capacity for another person; the complaint was therefore construed only as asserting claims by Plaintiff herself, not by M-EDIF or Sean P. Combs.
3. The court declined at that time to issue a pre-filing injunction, while warning Plaintiff that sanctions could be considered if the pattern of conduct continued.

KEY QUOTATIONS

“For the reasons set forth above, the Court DISMISSES this action without prejudice and without issuance and service of process.” (3)

FACTUAL BACKGROUND

Plaintiff proceeded pro se and in forma pauperis and attempted to bring the action in a representative capacity for M-EDIF and Sean P. Combs. The complaint sought a trial to restore Combs's civil and human rights and named the President and other defendants, but listed no damages. The magistrate judge characterized the allegations as frivolous and noted that Plaintiff had filed four recent frivolous actions. Plaintiff did not object to the Report and Recommendation.

PROCEDURAL HISTORY

Plaintiff, proceeding pro se and in forma pauperis, filed an action purporting to proceed in a representative capacity and seeking relief on behalf of Sean P. Combs. The magistrate judge recommended dismissal as frivolous and recommended a pre-filing injunction based in part on Plaintiff's recent frivolous filings. After conducting de novo review despite the absence of objections, the district court adopted the dismissal recommendation but declined to impose the pre-filing injunction.

DISPOSITION

dismissed

CASES CITED

- Mathews v. Weber, 423 U.S. 261, 270-71 (1976)
- Cruz v. Beto, 405 U.S. 319 (1972)
- Haines v. Kerner, 404 U.S. 519 (1972)
- Weller v. Department of Social Services, 901 F.2d 387 (4th Cir. 1990)

OPINION

IN THE UNITED STATES DISTRICT COURT DISTRICT OF SOUTH CAROLINA M-EDIF, Members of EDIF; W. MJ Boyd, Case No. 2:26-1467-RMG Founder also known as Wanda Boyd, Plaintiff, v. ORDER AND OPINION Donald J. Trump, President, et al., Defendants. This matter is before the Court on the Report and Recommendation (“R&R”) of the Magistrate Judge (Dkt. No. 10) recommending that this action be dismissed without prejudice and without issuance and service of process.

The R&R further recommends a pre-filing injunction against Plaintiff. For the reasons stated below, the Court dismisses this action without prejudice and without issuance and service of process. I. Background Plaintiff is proceeding pro se and in forma pauperis. Plaintiff attempts to bring this action in a representative capacity but cannot as a pro se litigant.

(Dkt. No. 10 at 2). Thus, the Court construes Plaintiff’s complaint only as to herself, not “M-EDIF.” Plaintiff sues various defendants for relief for “Sean P Diddy Combs” and seeks to have “case by trial to restore the civil and human rights of Mr. Combs.” (Id.). Plaintiff lists “n/a” for damages. (Id.).

On April 10, 2026, the Magistrate Judge filed an R&R recommending dismissal of this action without prejudice and without issuance and service of process. (Id.) (concluding Plaintiff’s allegations are “frivolous”). The R&R further recommended a pre-filing injunction against 1 Plaintiff. (Id. at 3-6).

The R&R notes four recent frivolous actions Plaintiff has filed just this year. (Id.). The R&R recommends a pre-filing injunction directing the Clerk not to accept any filing where Plaintiff is not pursuing claims with herself as Plaintiff. (Id. at 5). Plaintiff did not file objections to the R&R. II. Legal Standards A. Magistrate’s Report and Recommendation The Magistrate Judge makes only a recommendation to this Court.

The recommendation has no presumptive weight, and the responsibility for making a final determination remains with this Court. Mathews v. Weber, 423 U.S. 261, 270-71 (1976). The Court is charged with making a de novo determination only of those portions of the Report to

which specific objections are made, and the Court may accept, reject, or modify, in whole or in part, the recommendation of the Magistrate Judge, or recommit the matter to the Magistrate Judge with instructions.

28 U.S.C. § 636(b)(1). B. Pro Se Pleadings This Court liberally construes complaints filed by pro se litigants to allow the development of a potentially meritorious case. See *Cruz v. Beto*, 405 U.S. 319 (1972); *Haines v. Kerner*, 404 U.S. 519 (1972).

The requirement of liberal construction does not mean that the Court can ignore a clear failure in the pleadings to allege facts which set forth a viable federal claim, nor can the Court assume the existence of a genuine issue of material fact where none exists. See *Weller v. Dep't of Social Services*, 901 F.2d 387 (4th Cir. 1990). III. Discussion Though Plaintiff did not file objections to the R&R, the Court has conducted a de novo review of the record and finds that the Magistrate Judge ably summarized the factual and legal 2 issues in this matter and correctly concluded that this action should be dismissed without prejudice and without service of process.

(Dkt. No. 10 at 1-2). The Court adopts this portion of the R&R. Plaintiff's action on behalf of Sean Combs against the President and others is clearly frivolous. At this juncture, however, the Court declines to issue a pre-filing injunction against Plaintiff. Plaintiff is explicitly warned, however, that the Court may consider sanctions at a future date if Plaintiff's pattern of conduct persists.

Conclusion For the reasons set forth above, the Court DISMISSES this action without prejudice and without issuance and service of process. AND IT IS SO ORDERED. s/ Richard Mark Gergel
Richard Mark Gergel United States District Judge May 6, 2026 Charleston, South Carolina 3