

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PRECEDENTIAL VALUE	unpublished district court opinion; precedential status unknown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.

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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)

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