

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

James R. Watson, Jr. v. Meta Platforms Technologies, LLC and
C.S.C. Global

Watson · No. 4:26-cv-1351-SAL · Decided May 20, 2026

SUMMARY

The United States District Court for the District of South Carolina adopts a magistrate judge’s Report and Recommendation and summarily dismisses James R. Watson, Jr.’s action as duplicative of an earlier, statute-of-limitations-barred case involving the compromise of his Instagram account. The court overrules Watson’s objections, dismisses the action without prejudice and without issuance or service of process, and terminates his pending motions as moot.

CASE DETAILS

COURT	United States District Court for the District of South Carolina, Florence Division
WRITING FOR THE COURT	Sherri A. Lydon
JURISDICTION	United States District Court for the District of South Carolina, Florence Division
DECIDED	May 20, 2026
DOCKET	4:26-cv-1351-SAL
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court reviewed a magistrate judge's Report and Recommendation recommending summary dismissal of the pro se plaintiff's action as duplicative of an earlier, time-barred action. After reviewing the plaintiff's objections, the district court adopted the Report and dismissed the case without prejudice and without issuance and service of process.
STANDARD OF REVIEW	The district court reviews de novo those portions of a magistrate judge's report and recommendation to which a party makes sufficiently specific objections. For general objections, the court need only satisfy itself that there is no clear error on the face of the record before adopting the recommendation.

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QUESTIONS PRESENTED

1. Whether the district court properly reviewed and adopted the magistrate judge's recommendation after considering plaintiff's objections.
2. Whether the action was duplicative of plaintiff's earlier action and therefore subject to summary dismissal.
3. Whether plaintiff could avoid the statute-of-limitations bar by characterizing the claims as arising from defendants' conduct occurring from 2023 through 2025.

HOLDINGS

1. A district court must review de novo the portions of a magistrate judge's report or specified proposed findings to which a party makes sufficiently specific objections; when objections are only general, the court need determine only whether there is clear error on the face of the record before adopting the recommendation.
2. A district court may summarily dismiss an action as duplicative when the parties, issues, and available relief do not significantly differ from those in an earlier action.
3. A plaintiff cannot avoid a statute-of-limitations bar by relabeling claims arising from the same underlying injury and events as claims based on later efforts to remedy that injury.

KEY QUOTATIONS

“The recommendation has no presumptive weight, and the responsibility to make a final determination remains with this court.” (Review of a Magistrate Judge's Report)

“This case is duplicative of Plaintiff's earlier, closed case.” (Discussion)

FACTUAL BACKGROUND

Plaintiff's Instagram account was compromised in 2018, including a change to the email address associated with the account. He attempted to recover the account through communications with the defendants, but was unsuccessful. After his earlier action concerning the compromise and recovery efforts was dismissed as time-barred and affirmed on appeal, he filed this action based on the same underlying events while asserting that the claims concerned the defendants' conduct from 2023 through 2025.

PROCEDURAL HISTORY

Plaintiff previously sued the defendants over the compromise of his Instagram account and account-recovery efforts. The earlier action was dismissed as barred by the statute of limitations, and the Fourth Circuit affirmed on March 30, 2026. Plaintiff filed this action the next day, asserting claims arising from the same 2018 compromise while characterizing them as based on conduct occurring from 2023 through 2025. The magistrate judge recommended summary dismissal as duplicative, and the district court overruled plaintiff's objections, adopted the recommendation, and dismissed the case.

DISPOSITION

dismissed

CASES CITED

- Watson v. Meta Platforms Technologies, LLC, C/A No. 4:25-cv-8217-SAL, ECF Nos. 19, 34
- Mathews v. Weber, 423 U.S. 261, 270-71 (1976)
- Elijah v. Dunbar, 66 F.4th 454, 459-60 (4th Cir. 2023)
- United States v. Midgette, 478 F.3d 616, 622 (4th Cir. 2007)
- Diamond v. Colonial Life & Accident Insurance Co., 416 F.3d 310, 315 (4th Cir. 2005)
- Bayle v. South Carolina Department of Transportation, 542 S.E.2d 736, 740 (S.C. Ct. App. 2001)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Estelle v. Gamble, 429 U.S. 97, 106 (1976)
- Weller v. Department of Social Services, 901 F.2d 387, 390-91 (4th Cir. 1990)
- Cottle v. Bell, 229 F.3d 1142 (4th Cir. 2000) (Table)