

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

Goggins v. Anderson

Goggins · No. 1:23-cv-6709-TMC · Decided June 2, 2026

SUMMARY

The court granted Defendant Kathy Anderson’s Rule 12(b)(6) motion to dismiss Robert Goggins’s Fourth Amendment claim concerning an allegedly unlawful traffic stop, search, and seizure. Applying South Carolina’s three-year statute of limitations and Fourth Circuit precedent, the court held that the claim accrued when the search occurred in September 2020 and was therefore untimely. The court adopted the magistrate judge’s Report and Recommendation and overruled Plaintiff’s objections.

CASE DETAILS

COURT	United States District Court for the District of South Carolina, Aiken Division
JURISDICTION	United States District Court for the District of South Carolina, Aiken Division
DECIDED	June 2, 2026
DOCKET	1:23-cv-6709-TMC
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendant moved to dismiss the plaintiff's 42 U.S.C. § 1983 unlawful-search-and-seizure claim under Federal Rule of Civil Procedure 12(b)(6). A magistrate judge recommended dismissal as barred by the statute of limitations. The district court reviewed the plaintiff's objections, adopted the Report and Recommendation, overruled the objections, and granted the motion to dismiss.
STANDARD OF REVIEW	The district court reviewed specific objections to the magistrate judge's Report and Recommendation de novo and reviewed unobjected-to or merely general objections for clear error. The Rule 12(b)(6) inquiry assesses whether the complaint states a legally sufficient and plausible claim for relief under Rules 8(a)(2) and 12(b)(6).
PRECEDENTIAL VALUE	Unknown
PARTIES	Robert Goggins v. Kathy Anderson

TOPICS

section 1983

statute of limitations

motions to dismiss

civil rights

constitutional law

PRACTICE AREAS

civil rights

constitutional law

federal civil procedure

prisoner civil rights

QUESTIONS PRESENTED

1. Whether the plaintiff's 42 U.S.C. § 1983 claim based on an allegedly unlawful search and seizure was barred by South Carolina's three-year statute of limitations.
2. Whether the claim accrued when the search occurred or only when the state criminal proceedings ended or the evidence was suppressed.
3. Whether the court should reach the defendant's alternative qualified-immunity argument.

HOLDINGS

1. The plaintiff's § 1983 claim based on the alleged unlawful search and seizure accrued when the search occurred, and South Carolina's three-year statute of limitations barred the claim filed more than three years later.
2. The court declined to reach the defendant's alternative qualified-immunity argument because the statute-of-limitations ruling was dispositive.
3. The complaint did not allege a separate malicious-prosecution claim.

KEY QUOTATIONS

"Therefore, the motion to dismiss, (ECF No. 85), is GRANTED." (Discussion)

"Because it is undisputed the search that gives rise to this action occurred in September 2020, the court finds Plaintiff's unlawful search and seizure claim barred by the statute of limitations." (Discussion)

"A motion to dismiss filed pursuant to Federal Rule of Civil Procedure 12(b)(6) tests the legal sufficiency of a complaint or pleading." (Standard of Review)

FACTUAL BACKGROUND

In September 2020, Kathy Anderson, while on duty with the City of Clinton Police Department, allegedly conducted a traffic stop without probable cause and performed an unlawful search and seizure. Robert Goggins alleged that he was arrested and detained and sought \$80,000 in damages under 42 U.S.C. § 1983. He filed this action in December 2023, more than three years after the search, although a state court had suppressed evidence and dismissed the charges in January 2023.

PROCEDURAL HISTORY

Plaintiff filed suit in December 2023 alleging that defendant conducted an unlawful traffic stop, search, and seizure in September 2020. Defendant moved to dismiss based on qualified immunity and the statute of

limitations. After considering plaintiff's response, the magistrate judge recommended dismissal on limitations grounds and alternatively recommended against qualified immunity at that stage. The district court conducted the required review, adopted the recommendation on the limitations issue, declined to reach qualified immunity, and dismissed the action.

DISPOSITION

dismissed

CASES CITED

- Roseboro v. Garrison, 528 F.2d 309 (4th Cir. 1975)
- Elijah v. Dunbar, 66 F.4th 454, 459-61 (4th Cir. 2023)
- Mathews v. Weber, 423 U.S. 261, 270-71 (1976)
- United States v. Midgett, 478 F.3d 616, 622 (4th Cir. 2007)
- Dunlap v. TM Trucking of the Carolinas, LLC, 288 F. Supp. 3d 654, 662 (D.S.C. 2017)
- Greenspan v. Bros. Prop. Corp., 103 F. Supp. 3d 734, 737 (D.S.C. 2015)
- Camby v. Davis, 718 F.2d 198, 199-200 (4th Cir. 1983)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Martin v. Duffy, 858 F.3d 239, 245 (4th Cir. 2017)
- Stratton v. Mecklenburg County Department of Social Services, 521 F. App'x 278, 290 (4th Cir. 2013)
- Beaudett v. City of Hampton, 775 F.2d 1274, 1277-78 (4th Cir. 1985)
- Francis v. Giacomelli, 588 F.3d 186, 192-93 (4th Cir. 2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555, 557, 570 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 663, 679 (2009)
- Smith v. Travelpiece, 31 F.4th 878, 883, 887-88 (4th Cir. 2022)
- Wallace v. Kato, 549 U.S. 384, 388 (2007)
- Heck v. Humphrey, 512 U.S. 477 (1994)
- McDonough v. Smith, 588 U.S. 109, 123 (2019)
- Evans v. Chalmers, 703 F.3d 636, 647 (4th Cir. 2012)