

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH
CAROLINA

Dominique Jamal Williams v. Ruth Anne Thorton

Williams v. Thorton · No. 4:25-cv-13122-JD · Decided May 5, 2026

SUMMARY

The United States District Court for the District of South Carolina adopts a magistrate judge’s Report and Recommendation and dismisses without prejudice a pro se plaintiff’s constitutional claims arising from child-support enforcement actions. The court concludes that the Rooker-Feldman doctrine deprives it of subject-matter jurisdiction and notes that no objections were filed.

CASE DETAILS

COURT	United States District Court for the District of South Carolina
WRITING FOR THE COURT	Joseph Dawson, III
JURISDICTION	United States District Court for the District of South Carolina
DECIDED	May 5, 2026
DOCKET	4:25-cv-13122-JD
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court reviewed a magistrate judge's Report and Recommendation on initial review of a pro se amended complaint. No specific objections were filed, and the district court adopted the recommendation and dismissed the action without prejudice and without issuance and service of process.
STANDARD OF REVIEW	When no specific objections are filed to a magistrate judge's Report and Recommendation, the district court need not conduct de novo review and need only satisfy itself that there is no clear error on the face of the record.
PRECEDENTIAL VALUE	unpublished
PARTIES	Dominique Jamal Williams v. Ruth Anne Thorton

TOPICS

- subject matter jurisdiction
- civil procedure
- due process
- section 1983
- appellate procedure

PRACTICE AREAS

civil procedure

constitutional law

civil rights

family law

appellate procedure

QUESTIONS PRESENTED

1. Whether the district court should review the magistrate judge's Report and Recommendation for clear error when no specific objections were filed.
2. Whether the district court had subject-matter jurisdiction over a § 1983 action seeking relief from injuries allegedly caused by state child-support orders and related enforcement actions under the Rooker-Feldman doctrine.

HOLDINGS

1. When no specific objections are filed, the district court is not required to conduct de novo review and need only determine whether the record contains clear error.
2. The district court lacks subject-matter jurisdiction under the Rooker-Feldman doctrine over claims that seek relief for injuries caused by state-court child-support determinations when resolving the claims would require the federal court to review or invalidate those state-court orders.

KEY QUOTATIONS

“this action is DISMISSED WITHOUT PREJUDICE and without issuance and service of process.” (E. Conclusion)

“federal district courts may not review or set aside final judgments of state courts” (B. Report and Recommendation)

FACTUAL BACKGROUND

Plaintiff, proceeding pro se, challenged child-support enforcement actions allegedly including wage garnishment, suspension of an occupational license, and issuance of enforcement orders. He alleged that the actions were taken without lawful authority, notice, or a hearing and violated due process and access-to-courts rights. The challenged actions arose from state child-support and income-withholding orders in proceedings to which Plaintiff was a party.

PROCEDURAL HISTORY

Plaintiff initiated a § 1983 action challenging child-support enforcement actions. After initial review, the magistrate judge directed Plaintiff to amend because the original complaint failed to state sufficient facts. Plaintiff filed an amended complaint, and the magistrate judge recommended dismissal without prejudice for lack of subject-matter jurisdiction under the Rooker-Feldman doctrine. Plaintiff filed no objections, so the district court reviewed the record for clear error, found none, adopted the Report, and dismissed the action.

DISPOSITION

dismissed

CASES CITED

- Mathews v. Weber, 423 U.S. 261, 270-71 (1976)
- Rooker v. Fidelity Trust Co., 263 U.S. 413 (1923)
- United States v. Schronce, 727 F.2d 91, 94 & n.4 (4th Cir. 1984)
- Diamond v. Colonial Life & Accident Ins. Co., 416 F.3d 310, 315 (4th Cir. 2005)
- Thomas v. Arn, 474 U.S. 140, 147 (1985)
- Camby v. Davis, 718 F.2d 198, 199 (4th Cir. 1983)

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