

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH  
CAROLINA

Travis Wright v. Director Ray, et al.

Wright · No. 2:23-05913-JFA-MGB · Decided February 6, 2026

SUMMARY

The United States District Court for the District of South Carolina adopts a Magistrate Judge’s Report and Recommendation in Travis Wright’s 42 U.S.C. § 1983 action concerning conditions of pretrial detention and alleged inadequate medical treatment. The court denies Wright’s motion for summary judgment and grants the defendants’ motions for summary judgment. The court declines to express an opinion on whether the complaint constitutes a strike under 28 U.S.C. § 1915(e)(2)(B)(i).

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                                                             |
|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the District of South Carolina                                                                                                                                                                                                                                                                                                                                             |
| WRITING FOR THE COURT | Joseph F. Anderson, Jr.                                                                                                                                                                                                                                                                                                                                                                                     |
| JURISDICTION          | United States District Court for the District of South Carolina                                                                                                                                                                                                                                                                                                                                             |
| DECIDED               | February 6, 2026                                                                                                                                                                                                                                                                                                                                                                                            |
| DOCKET                | 2:23-05913-JFA-MGB                                                                                                                                                                                                                                                                                                                                                                                          |
| DISPOSITION           | other                                                                                                                                                                                                                                                                                                                                                                                                       |
| PROCEDURAL POSTURE    | The district court reviewed a Magistrate Judge's Report and Recommendation addressing cross-motions for summary judgment in a pro se prisoner's 42 U.S.C. § 1983 action. The court considered Plaintiff's objections, reviewed the challenged portions of the Report, adopted the Report as modified, denied Plaintiff's motion for summary judgment, and granted Defendants' motions for summary judgment. |
| STANDARD OF REVIEW    | A district court conducts de novo review of the portions of a Magistrate Judge's Report and Recommendation to which a specific objection is made, and reviews unobjected-to or nonspecific portions for clear error. The court also applied the summary-judgment standard incorporated from the Report and construed the pro se pleadings liberally.                                                        |
| PRECEDENTIAL VALUE    | unpublished                                                                                                                                                                                                                                                                                                                                                                                                 |

TOPICS

summary judgment

civil procedure

section 1983

prisoners rights

due process

## PRACTICE AREAS

civil procedure

civil rights

constitutional law

prisoner litigation

summary judgment

## QUESTIONS PRESENTED

1. Whether Plaintiff's objections to the Magistrate Judge's Report and Recommendation were sufficiently specific to require de novo review.
2. Whether the Report and Recommendation should be adopted and Plaintiff's motion for summary judgment denied while Defendants' motions for summary judgment were granted.
3. Whether the district court had authority to determine whether the dismissal of the prisoner action constituted a strike under 28 U.S.C. § 1915(e)(2)(B)(i).

## HOLDINGS

1. Objections that merely repeat unsupported factual allegations and do not identify a specific factual or legal error in the Report do not warrant de novo review of the challenged conclusions; the court may review such portions for clear error.
2. The Magistrate Judge's recommendation was properly adopted: Plaintiff's motion for summary judgment was denied and Defendants' motions for summary judgment were granted.
3. The district court declined to express an opinion on whether the complaint should be deemed a strike because the authority to adjudicate strike status belongs to the court considering a later request for in forma pauperis status.

## KEY QUOTATIONS

*“district courts lack authority to adjudicate whether their dismissals of prisoner actions constitute strikes under the three-strikes rule.”* (III)

*“the strike decision is solely for the district court considering a subsequent request for IFP status”* (III)

## FACTUAL BACKGROUND

Travis Wright, a state pretrial detainee proceeding pro se and in forma pauperis, alleged that officials at the Sumter Lee Regional Detention Center violated his constitutional rights. His allegations concerned placement in individual housing, inadequate linens, showers, sanitation, cleaning supplies, and meals, commissary losses, unaddressed grievances and complaints, and inadequate medical treatment. Defendants submitted affidavits and documentation, while Wright's objections principally repeated unsupported factual assertions and did not provide admissible evidence or address the Report's legal conclusions.

## PROCEDURAL HISTORY

Plaintiff filed the action on November 17, 2023, later amending and supplementing his complaint. The parties filed cross-motions for summary judgment, and the Magistrate Judge recommended denying Plaintiff's motion

and granting Defendants' motions. Plaintiff objected to the Report and Recommendation, but the district court found that his objections were largely unsupported factual assertions and did not identify specific legal error. The court adopted the Report as modified and declined to express an opinion on whether the complaint constituted a strike under the Prison Litigation Reform Act.

## DISPOSITION

other

## CASES CITED

- Mathews v. Weber, 423 U.S. 261 (1976)
- Carniewski v. West Virginia Board of Probation & Parole, 974 F.2d 1330 (4th Cir. 1992)
- Camby v. Davis, 718 F.2d 198, 199-200 (4th Cir. 1983)
- Diamond v. Colonial Life & Accident Insurance Co., 416 F.3d 310, 315-16 (4th Cir. 2005)
- Dunlap v. TM Trucking of the Carolinas, LLC, No. 0:15-cv-04009-JMC, 2017 WL 6345402, at \*5 n.6 (D.S.C. Dec. 12, 2017)
- Workman v. Perry, No. 6:17-cv-00765-RBH, 2017 WL 4791150, at \*1 (D.S.C. Oct. 23, 2017)
- Orpiano v. Johnson, 687 F.2d 44, 47 (4th Cir. 1982)
- Staley v. Norton, No. 9:07-0288-PMD, 2007 WL 821181, at \*1 (D.S.C. Mar. 2, 2007)
- Howard v. Secretary of Health and Human Services, 932 F.2d 505, 509 (6th Cir. 1991)
- Cruz v. Beto, 405 U.S. 319 (1972)
- Haines v. Kerner, 404 U.S. 519 (1972)
- Shealy v. Winston, 929 F.2d 1009, 1011 (4th Cir. 1991)
- United States v. Wilson, 699 F.3d 789, 797 (4th Cir. 2012)
- Elijah v. Dunbar, 66 F.4th 454, 461 (4th Cir. 2023)
- Pitts v. South Carolina, 65 F.4th 141, 146, 150 (4th Cir. 2023)