

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

Reynolds-Hall v. University of South Carolina

Civil Action No. 3:24-6887-MGL-PJG · No. Civil Action No. 3:24-6887-MGL-PJG · Decided March 31, 2026

SUMMARY

The United States District Court for the District of South Carolina adopted the magistrate judge’s report and recommendation and granted defendants’ motions to dismiss most of Kamarah Reynolds-Hall’s claims. The court dismissed the negligence claims as time-barred, dismissed claims against the prosecutors based on absolute prosecutorial immunity, dismissed the malicious-prosecution claims under Heck v. Humphrey, and dismissed the false-arrest claims as untimely. The court denied the motions to the extent the amended complaint may assert civil-conspiracy or defamation claims, denied the motion for default judgment and other motions, and remanded the matter to the magistrate judge for further proceedings.

CASE DETAILS

COURT	United States District Court for the District of South Carolina, Columbia Division
WRITING FOR THE COURT	Mary Geiger Lewis
JURISDICTION	United States District Court for the District of South Carolina, Columbia Division
DECIDED	March 31, 2026
DOCKET	Civil Action No. 3:24-6887-MGL-PJG
DISPOSITION	remanded
PROCEDURAL POSTURE	After referral to a magistrate judge, the district court conducted de novo review of the portions of the magistrate judge's report and recommendation to which plaintiff objected. The court adopted the report, granted defendants' Rule 12(b)(6) motions except as to potential civil-conspiracy and defamation claims not addressed by the motions, denied plaintiff's motion for default judgment and subsequent motions, and remanded for further proceedings before the magistrate judge.
STANDARD OF REVIEW	The district court reviewed specific objections to the report and recommendation de novo under 28 U.S.C. § 636(b)(1), but was not required to conduct de novo review of general and conclusory

objections. For Rule 12(b)(6), the court accepted well-pleaded factual allegations as true, viewed them in the light most favorable to plaintiff, disregarded legal conclusions, and required facts sufficient to state a facially plausible claim.

PRECEDENTIAL VALUE

Unpublished district-court order; nonprecedential

TOPICS

motions to dismiss

section 1983

statute of limitations

default judgment

civil procedure

PRACTICE AREAS

Civil procedure

Civil rights

Constitutional law

Torts

QUESTIONS PRESENTED

1. Whether the negligence claim against Holder Properties was barred by South Carolina's three-year statute of limitations.
2. Whether the negligence claim against the University was barred by the statute of limitations.
3. Whether the Section 1983 malicious-prosecution claims against the prosecutors were barred by absolute prosecutorial immunity.
4. Whether the Section 1983 malicious-prosecution claims against the police officers were barred by *Heck v. Humphrey* because plaintiff's trespassing conviction had not been invalidated.
5. Whether the Section 1983 false-arrest claims were barred by the statute of limitations.
6. Whether plaintiff stated a plausible Section 1983 claim against McKellar.
7. Whether the University and Holder Properties were in default despite having filed timely motions to dismiss.
8. Whether allegations not addressed by the motions potentially stated civil-conspiracy or defamation claims requiring further proceedings.

HOLDINGS

1. The negligence claim against Holder Properties was barred by South Carolina's three-year statute of limitations because the alleged injury occurred on August 23, 2020, and plaintiff did not file suit until November 25, 2024.
2. The negligence claim against the University was barred by the same three-year statute of limitations because it arose from the August 23, 2020 incident and was filed more than three years later.
3. The Section 1983 malicious-prosecution claims against Gipson and Goldberg were dismissed because prosecutors have absolute immunity for initiating and pursuing criminal prosecutions and for conduct intimately associated with the judicial phase of the criminal process.

4. To the extent plaintiff sought damages under Section 1983 based on his prosecution and resulting trespassing conviction, the malicious-prosecution claims against the police officers failed under *Heck v. Humphrey* because plaintiff had not shown that the conviction had been reversed, invalidated, or otherwise called into question.
5. The Section 1983 false-arrest claims were barred by South Carolina's three-year statute of limitations because the claims accrued when plaintiff was detained pursuant to legal process following his 2020 arrests.
6. The claims against McKellar were dismissed because the complaint did not allege a plausible constitutional violation or sufficient personal involvement by McKellar.
7. Default judgment was denied because the University and Holder Properties had filed timely motions to dismiss and therefore were not in default for failing to file answers.
8. The court did not decide whether plaintiff stated civil-conspiracy or defamation claims; it held only that the allegations potentially asserted those claims and remanded for the magistrate judge to consider them in the first instance.

KEY QUOTATIONS

“The Court is charged with making a de novo determination of those portions of the Report to which specific objection is made, and the Court may accept, reject, or modify, in whole or in part, the recommendation of the Magistrate Judge or recommit the matter with instructions.” (Section III.A)

“The Supreme Court has held under § 1983 “a state prosecutor ha[s] absolute immunity for the initiation and pursuit of a criminal prosecution.”” (Section IV.A.3)

“The rule established by Heck applies whenever a conviction results from the challenged arrest or prosecution. It has nothing to do with where a criminal defendant is housed or the label assigned to him following conviction.” (Section IV.A.4.a)

“Therefore, it is the judgment of the Court Defendants’ motions to dismiss are GRANTED except to the extent Reynolds-Hall may have stated a claim of civil conspiracy and/or defamation.” (Section V)

FACTUAL BACKGROUND

Plaintiff alleged that he was assaulted and injured by multiple student-athletes at a dormitory near the University of South Carolina on August 23, 2020. He alleged that university personnel, university police officers, and prosecutors concealed or omitted evidence to protect the student-athletes, then arrested him and charged him with first-degree burglary; he ultimately pleaded guilty to the lesser offense of trespassing. Plaintiff asserted negligence claims against Holder Properties and the University, Section 1983 malicious-prosecution and false-arrest claims against police officers and prosecutors, and allegations involving withheld video evidence, conspiracy, and defamatory statements.

PROCEDURAL HISTORY

Plaintiff, proceeding pro se, filed an amended civil-rights and state-law tort action arising from an alleged assault, subsequent arrest and prosecution, and alleged concealment of evidence. The magistrate judge construed

the complaint as asserting Section 1983 malicious-prosecution claims, a negligence claim, and related claims, recommended dismissal, and denied plaintiff's motions to amend. Plaintiff objected, sought default judgment against the University and Holder Properties, and filed additional motions. The district court overruled the objections, adopted the report and recommendation, dismissed the claims addressed by the motions, denied the additional motions, and remanded for consideration of potentially unaddressed conspiracy and defamation claims.

DISPOSITION

remanded

REMAND INSTRUCTIONS

The case was remanded to the magistrate judge for further review of the potentially unaddressed civil-conspiracy and defamation claims, without any suggestion on their merits. The court directed no particular merits result.

CASES CITED

- Mathews v. Weber, 423 U.S. 261, 270 (1976)
- Orpiano v. Johnson, 687 F.2d 44, 47 (4th Cir. 1982)
- Edwards v. City of Goldsboro, 178 F.3d 231, 243-44 (4th Cir. 1999)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Mylan Lab'ys, Inc. v. Matkari, 7 F.3d 1130, 1134 (4th Cir. 1993)
- Cline v. J.E. Faulkner Homes, Inc., 597 S.E.2d 27, 29 (S.C. Ct. App. 2004)
- Poly-Med, Inc. v. Novus Sci. Pte. Ltd., 878 S.E.2d 896, 900 (S.C. 2022)
- Anonymous Taxpayer v. S.C. Dep't of Revenue, 661 S.E.2d 73, 80 (S.C. 2008)
- Buckley v. Fitzsimmons, 509 U.S. 259, 269 (1993)
- Imbler v. Pachtman, 424 U.S. 409, 427, 430 (1976)
- Dababnah v. Keller-Burnside, 208 F.3d 467, 470 (4th Cir. 2000)
- Dobbs v. Jackson Women's Health Org., 597 U.S. 215, 348 (2022) (Roberts, C.J., concurring in judgment)
- Karsten v. Kaiser Found. Health Plan of Mid-Atl. States, Inc., 36 F.3d 8, 11 (4th Cir. 1994)
- Heck v. Humphrey, 512 U.S. 477, 484, 486-88 (1994)
- Deal v. State, 527 S.E.2d 112, 112 (S.C. 2000)
- United States v. King, 673 F.3d 274, 282 (4th Cir. 2012)
- Ballard v. Burton, 444 F.3d 391, 397 (5th Cir. 2006)
- Havens v. Johnson, 783 F.3d 776, 784 (10th Cir. 2015)
- Smith v. Travelpiece, 31 F.4th 878, 883 (4th Cir. 2022)
- Owens v. Okure, 488 U.S. 235, 239, 249-50 (1989)
- Wallace v. Kato, 549 U.S. 384, 397 (2007)

- *Paradis v. Charleston Cnty. Sch. Dist.*, 861 S.E.2d 774, 780 & n.9 (S.C. 2021)
- *King v. Rubenstein*, 825 F.3d 206, 214 (4th Cir. 2016)
- *Erickson v. Pardus*, 551 U.S. 89, 94 (2007)
- *McBride v. Sch. Dist. of Greenville Cnty.*, 698 S.E.2d 845, 852 (S.C. Ct. App. 2010)
- *Fleming v. Rose*, 567 S.E.2d 857, 860 (S.C. 2002)

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