

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

Thomas V. Lampley v. Scotty Bodiford

Lampley v. Bodiford · No. 2:26-cv-00027-JDA · Decided March 12, 2026

SUMMARY

The United States District Court for the District of South Carolina dismissed with prejudice, but not on the merits, a pro se state pretrial detainee’s petition for a writ of habeas corpus under 28 U.S.C. § 2241. The court adopted the Magistrate Judge’s recommendation, as modified, and dismissed the petition under the abstention doctrine established in *Younger v. Harris*. The court also denied a certificate of appealability.

CASE DETAILS

COURT	United States District Court for the District of South Carolina, Charleston Division
WRITING FOR THE COURT	Jacquelyn D. Austin
JURISDICTION	United States District Court for the District of South Carolina, Charleston Division
DECIDED	March 12, 2026
DOCKET	2:26-cv-00027-JDA
DISPOSITION	dismissed
PROCEDURAL POSTURE	A state pretrial detainee filed a pro se petition for a writ of habeas corpus under 28 U.S.C. § 2241. The matter was referred to a magistrate judge, who recommended summary dismissal under <i>Younger v. Harris</i> . The petitioner filed no objections, and the district court reviewed the recommendation for clear error.
STANDARD OF REVIEW	In the absence of specific objections to the magistrate judge's Report and Recommendation, the district court reviews the recommendation for clear error on the face of the record. Specific objections would require de novo review under 28 U.S.C. § 636(b).
PRECEDENTIAL VALUE	unpublished district court opinion; precedential status not stated
PARTIES	Thomas V. Lampley v. Scotty Bodiford

TOPICS

federal habeas corpus

post-conviction relief

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the district court should accept the magistrate judge's Report and Recommendation when the petitioner filed no objections.
2. Whether the petition should be dismissed under *Younger v. Harris* because federal intervention in the state pretrial proceedings was barred by abstention principles.
3. Whether a certificate of appealability should issue after dismissal on procedural grounds.

HOLDINGS

1. When no timely specific objection is filed to a magistrate judge's Report and Recommendation, the district court need only review the recommendation for clear error on the face of the record rather than conduct de novo review.
2. The petition was barred by *Younger* abstention and was therefore dismissed with prejudice on procedural, nonmerits grounds.
3. A certificate of appealability should not issue because the petitioner did not satisfy the required showing for appellate review of the procedural dismissal.

KEY QUOTATIONS

“Accordingly, the Petition is DISMISSED with prejudice, not on the merits, under Younger.”

“The Court will review the Report only for clear error in the absence of an objection.”

“When the district court denies relief on procedural grounds, the prisoner must demonstrate both that the dispositive procedural ruling is debatable, and that the petition states a debatable claim of the denial of a constitutional right.”

FACTUAL BACKGROUND

Lampley was a state pretrial detainee who filed a federal habeas petition under 28 U.S.C. § 2241. The petition sought federal habeas relief while related state criminal proceedings were apparently ongoing. The court relied on the magistrate judge's recommendation that *Younger* abstention barred the action.

PROCEDURAL HISTORY

The petition was docketed on January 6, 2026. On February 11, 2026, the magistrate judge issued a Report and Recommendation recommending summary dismissal because the petition was barred by *Younger* abstention. After the petitioner failed to object, the district court accepted the recommendation as modified, dismissed the petition with prejudice on nonmerits grounds, and determined that a certificate of appealability should not issue.

DISPOSITION

dismissed

CASES CITED

- *Younger v. Harris*, 401 U.S. 37 (1971)
- *Mathews v. Weber*, 423 U.S. 261, 270-71 (1976)
- *Diamond v. Colonial Life & Accident Insurance Co.*, 416 F.3d 310, 315 (4th Cir. 2005)
- *Nivens v. Gilchrist*, 444 F.3d 237, 247 (4th Cir. 2006)
- *Slack v. McDaniel*, 529 U.S. 473, 484-85 (2000)
- *Miller-El v. Cockrell*, 537 U.S. 322, 336-38 (2003)

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