

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

Nierre Gray-Gentry v. 7th Circuit Solicitor’s Office, Spartanburg
County, State of South Carolina, Tyler Brown

Gray-Gentry · No. 7:25-cv-07312-DCC · Decided April 13, 2026

SUMMARY

The United States District Court for the District of South Carolina dismissed Nierre Gray-Gentry’s civil-rights action arising from ongoing state criminal proceedings. The court held that Younger abstention applied and that Defendant Tyler Brown was entitled to prosecutorial immunity. The court dismissed the remaining action with prejudice, without leave to amend or issuance and service of process, and denied Plaintiff’s motion to expedite.

CASE DETAILS

COURT	United States District Court for the District of South Carolina, Spartanburg Division
WRITING FOR THE COURT	Donald C. Coggins, Jr.
JURISDICTION	United States District Court for the District of South Carolina, Spartanburg Division
DECIDED	April 13, 2026
DOCKET	7:25-cv-07312-DCC
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff objected to a magistrate judge’s Report and Recommendation recommending dismissal of his civil-rights complaint. The district court conducted de novo review, adopted the recommendation in part, found part moot because several defendants had been voluntarily dismissed, and dismissed the remaining claims with prejudice without issuance or service of process and without leave to amend.
STANDARD OF REVIEW	De novo review of portions of the magistrate judge’s Report and Recommendation to which specific objections were made; clear-error review applies in the absence of a timely specific objection.
PRECEDENTIAL VALUE	nonprecedential district-court order

PARTIES

Nierre Gray-Gentry v. 7th Circuit Solicitor's Office, Spartanburg County, State of South Carolina, Tyler Brown

TOPICS

section 1983 injunctions civil procedure government liability constitutional law

PRACTICE AREAS

civil rights constitutional law criminal procedure federal courts

QUESTIONS PRESENTED

1. Whether Younger abstention required dismissal of Plaintiff's request for injunctive relief interfering with ongoing state criminal proceedings.
2. Whether Defendant Tyler Brown was entitled to prosecutorial immunity for conduct connected with judicial proceedings.
3. Whether the claims against the 7th Circuit Solicitor's Office, Spartanburg County, and the State of South Carolina remained justiciable after Plaintiff voluntarily dismissed those defendants.

HOLDINGS

1. Younger abstention was appropriate because ongoing state judicial proceedings existed, the proceedings implicated important state interests, and Plaintiff had an adequate opportunity to raise his federal claims in the state proceedings.
2. Defendant Tyler Brown was entitled to prosecutorial immunity because Plaintiff's claims concerned core prosecutorial activities in or connected with judicial proceedings.
3. The portion of the magistrate judge's recommendation concerning the 7th Circuit Solicitor's Office, Spartanburg County, and the State of South Carolina was moot because Plaintiff had voluntarily dismissed those defendants.

KEY QUOTATIONS

"The States' interest in administering their criminal justice systems free from federal interference is one of the most powerful of the considerations that should influence a court considering equitable types of relief."
(Analysis)

"Here, Plaintiff has the opportunity to assert his claims in the Spartanburg County General Sessions Court. Accordingly, abstention is appropriate under Younger." (Analysis)

FACTUAL BACKGROUND

Plaintiff brought a civil-rights action concerning ongoing state criminal proceedings in Spartanburg County General Sessions Court. He clarified that he sought only injunctive relief to terminate the state prosecution and did not seek damages or federal interference in state affairs. His remaining claim was against prosecutor Tyler

Brown, while the 7th Circuit Solicitor's Office, Spartanburg County, and the State of South Carolina had been voluntarily dismissed.

PROCEDURAL HISTORY

Plaintiff filed a complaint alleging civil-rights violations arising from ongoing South Carolina criminal proceedings. The matter was referred to Magistrate Judge Kevin F. McDonald under 28 U.S.C. § 636(b) and Local Civil Rule 73.02(B)(2), D.S.C. The magistrate judge recommended dismissal with prejudice, without leave to amend, and without issuance and service of process. Plaintiff filed objections, a supplement, and a motion to expedite. The district court reviewed the challenged portions de novo, treated the claims against three voluntarily dismissed defendants as moot, adopted the recommendation in part, dismissed the remaining action, and denied the motion to expedite.

DISPOSITION

dismissed

CASES CITED

- Mathews v. Weber, 423 U.S. 261 (1976)
- Diamond v. Colonial Life & Accident Insurance Co., 416 F.3d 310, 315 (4th Cir. 2005)
- Younger v. Harris, 401 U.S. 37 (1971)
- Gilliam v. Foster, 75 F.3d 881, 903-04 (4th Cir. 1996)
- Martin Marietta Corp. v. Maryland Commission on Human Relations, 38 F.3d 1392, 1396 (4th Cir. 1994)
- Middlesex County Ethics Committee v. Garden State Bar Association, 457 U.S. 423, 432 (1982)
- Kelly v. Robinson, 479 U.S. 36, 49 (1986)
- Kugler v. Helfant, 421 U.S. 117, 124 (1975)
- Buckley v. Fitzsimmons, 509 U.S. 259, 267-71 (1993)
- Dababnah v. Keller-Burnside, 208 F.3d 467 (4th Cir. 2000)