

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA

Trenton Phelps v. TC/American Crane Company

Phelps · No. 25-CV-0817 (JMB/LIB) · Decided January 22, 2026

SUMMARY

The United States District Court for the District of Minnesota adopted a magistrate judge’s Report and Recommendation recommending dismissal without prejudice. The court found no clear error because neither party filed timely objections, granted in part and denied in part the defendant’s motion to dismiss, and dismissed the complaint without prejudice.

CASE DETAILS

COURT	United States District Court for the District of Minnesota
WRITING FOR THE COURT	Jeffrey M. Bryan
JURISDICTION	United States District Court for the District of Minnesota
DECIDED	January 22, 2026
DOCKET	25-CV-0817 (JMB/LIB)
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court reviewed a magistrate judge's Report and Recommendation recommending dismissal without prejudice. Neither party filed a timely objection.
STANDARD OF REVIEW	In the absence of timely objections to the Report and Recommendation, the district court reviews for clear error.
PRECEDENTIAL VALUE	Unpublished district court order

TOPICS

- motions to dismiss
- civil procedure
- pleadings

PRACTICE AREAS

- civil procedure
- commercial litigation

QUESTIONS PRESENTED

1. What standard of review applies when neither party timely objects to a magistrate judge's Report and Recommendation?

2. Whether the Report and Recommendation recommending dismissal without prejudice should be adopted.

HOLDINGS

1. When neither party timely objects to a magistrate judge's Report and Recommendation, the district court reviews the recommendation for clear error.
2. The Report and Recommendation was adopted because the district court found no clear error.
3. The complaint was dismissed without prejudice, and the defendant's motion to dismiss was granted in part and denied in part.

KEY QUOTATIONS

“In the absence of timely objections, the Court reviews the R&R for clear error.”

“Finding no clear error, and based upon all the files, records, and proceedings in the above-captioned matter, IT IS HEREBY ORDERED THAT:”

FACTUAL BACKGROUND

The opinion contains no material factual discussion concerning the underlying dispute. It addresses the parties' failure to object to the magistrate judge's Report and Recommendation and the resulting disposition of the complaint.

PROCEDURAL HISTORY

Magistrate Judge Leo I. Brisbois issued an October 14, 2025 Report and Recommendation recommending dismissal without prejudice. After the objection period expired without objections, the district court reviewed the recommendation for clear error, adopted it, granted in part and denied in part the defendant's motion to dismiss, and dismissed the complaint without prejudice.

DISPOSITION

dismissed

CASES CITED

- *Grinder v. Gammon*, 73 F.3d 793, 795 (8th Cir. 1996) (per curiam)

OPINION

UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA Trenton Phelps, Case No. 25-CV-0817 (JMB/LIB) Petitioner, v. ORDER TC/ American Crane Company, Defendant. This matter is before the Court on the Report and Recommendation (R&R) of United States Magistrate Leo I. Brisbois dated October 14, 2025. (Doc. No. 36.)

The R&R recommends that the Court dismiss this action without prejudice. (Id.) Neither party has objected to the R&R, and the time to do so has now passed. See D. Minn. L.R. 72.2(b)(1). In the absence of timely objections, the Court reviews the R&R for clear error. See Fed. R. Civ. P. 72(b); *Grinder v. Gammon*, 73 F.3d 793, 795 (8th Cir. 1996) (per curiam). Finding no clear error, and based upon all the files, records, and proceedings in the above- captioned matter, IT IS HEREBY ORDERED THAT: 1.

The R&R (Doc. No. 36) is ADOPTED; 2. Defendant's Motion to Dismiss (Doc. No. 21) is GRANTED IN PART and DENIED IN PART; and 3. The Complaint (Doc. No. 1) is DISMISSED WITHOUT PREJUDICE. LET JUDGMENT BE ENTERED ACCORDINGLY. Dated: January 22, 2026 /s/ Jeffrey M. Bryan Judge Jeffrey M. Bryan United States District Court