

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH
CAROLINA, ANDERSON/GREENWOOD DIVISION

Quincy L. Brown v. Crayman Harvey, Jovan Haynes

No. 8:25-cv-13294-RMG, United States District Court for the District of South Carolina, Anderson/Greenwood
Division (January 7, 2026)

SUMMARY

The United States District Court for the District of South Carolina reviewed a magistrate judge's Report and Recommendation concerning a pro se pretrial detainee's 42 U.S.C. § 1983 claims regarding detention conditions, failure to protect, and inadequate medical treatment. Because the plaintiff failed to amend his complaint or object to the Report and Recommendation after being warned, the court adopted the portion recommending dismissal for failure to prosecute under Federal Rule of Civil Procedure 41(b). The action was dismissed without prejudice, without issuance and service of process, and without leave to amend.

CASE DETAILS

COURT	United States District Court for the District of South Carolina, Anderson/Greenwood Division
WRITING FOR THE COURT	Richard Mark Gergel
JURISDICTION	United States District Court for the District of South Carolina, Anderson/Greenwood Division
DECIDED	January 7, 2026
DOCKET	8:25-cv-13294-RMG
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se pretrial detainee brought a 42 U.S.C. § 1983 action in forma pauperis. After the magistrate judge ordered Plaintiff to amend his complaint and recommended dismissal for failure to prosecute when he did not do so, the district court reviewed the Report and Recommendation without objections and dismissed the action without prejudice.
STANDARD OF REVIEW	In the absence of specific objections to the magistrate judge's Report and Recommendation, the district court reviews for clear error rather than conducting de novo review.
PRECEDENTIAL VALUE	District court order; no precedential status identified in the source.

PARTIES

Quincy L. Brown v. Crayman Harvey, Jovan Haynes

TOPICS

sanctions

civil procedure

section 1983

prisoners rights

due process

PRACTICE AREAS

Federal civil procedure

Prisoner civil rights

Section 1983 litigation

QUESTIONS PRESENTED

1. Whether the district court should adopt the magistrate judge's recommendation after Plaintiff filed no objections.
2. Whether dismissal without prejudice was appropriate under Federal Rule of Civil Procedure 41(b) for Plaintiff's failure to prosecute after he failed to comply with the order directing him to file an amended complaint.

HOLDINGS

1. When no timely specific objections are filed to a magistrate judge's Report and Recommendation, the district court need only review the recommendation for clear error before accepting it.
2. A district court may dismiss an action without prejudice under Federal Rule of Civil Procedure 41(b) when a plaintiff fails to comply with an order to amend and fails to respond despite an explicit warning that dismissal may result.

KEY QUOTATIONS

"Given the Magistrate Judge's prior explicit warning that dismissal would be recommended if the Plaintiff failed to respond, dismissal is the only appropriate sanction." (3)

FACTUAL BACKGROUND

Quincy L. Brown was a pretrial detainee at the Alvin S. Glenn Detention Center in South Carolina. He alleged that Defendants failed to protect inmates, that the detention-center living conditions were inhumane, and that he contracted an infectious disease without receiving proper treatment. He sought \$180,000 in damages for pain and suffering, but failed to file an amended complaint after being ordered to do so and failed to object to the magistrate judge's Report and Recommendation.

PROCEDURAL HISTORY

Plaintiff filed claims concerning alleged unsafe and inhumane detention conditions and inadequate medical treatment. The magistrate judge advised that the complaint was deficient, ordered Plaintiff to file an amended complaint, and later recommended summary dismissal under Federal Rule of Civil Procedure 41(b) after Plaintiff failed to respond. Plaintiff filed no objections to the Report and Recommendation, so the district court reviewed it for clear error, adopted the portion addressing failure to prosecute, and dismissed the action.

DISPOSITION

dismissed

CASES CITED

- Mathews v. Weber, 423 U.S. 261, 270-71
- Diamond v. Colonial Life & Accident Ins. Co., 416 F.3d 310, 315

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