

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH
CAROLINA

Tyrone Maurice McBride v. Scotty Bodiford

McBride · No. 8:25-cv-13919-JDA · Decided January 23, 2026

SUMMARY

The United States District Court for the District of South Carolina adopts a magistrate judge's Report and Recommendation and summarily dismisses Tyrone Maurice McBride's 28 U.S.C. § 2241 habeas petition. The court dismisses the action with prejudice, not on the merits, based on failure to exhaust state remedies and abstention under *Younger v. Harris*. The court also denies a certificate of appealability.

CASE DETAILS

COURT	United States District Court for the District of South Carolina
WRITING FOR THE COURT	Jacquelyn D. Austin
JURISDICTION	United States District Court for the District of South Carolina, Anderson/Greenwood Division
DECIDED	January 23, 2026
DOCKET	8:25-cv-13919-JDA
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner sought habeas corpus relief under 28 U.S.C. § 2241. After the magistrate judge recommended summary dismissal for failure to exhaust state remedies and under <i>Younger</i> abstention, petitioner filed no objections. The district court reviewed the recommendation for clear error, adopted it, and dismissed the action with prejudice, not on the merits.
STANDARD OF REVIEW	In the absence of specific objections to a magistrate judge's report and recommendation, the district court reviews the report for clear error rather than conducting de novo review.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Tyrone Maurice McBride v. Scotty Bodiford

TOPICS

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the district court should review the magistrate judge's Report and Recommendation for clear error when the petitioner filed no objections.
2. Whether the § 2241 petition should be summarily dismissed because petitioner failed to exhaust state court remedies and Younger abstention applies.
3. Whether petitioner was entitled to a certificate of appealability after the action was dismissed on procedural grounds.

HOLDINGS

1. When a party files no timely objections to a magistrate judge's Report and Recommendation, the district court need only review the recommendation for clear error before accepting it.
2. The petition was summarily dismissed with prejudice, not on the merits, because petitioner failed to exhaust state remedies and Younger abstention required dismissal.
3. A certificate of appealability will not issue because petitioner failed to make the required substantial showing of the denial of a constitutional right.

KEY QUOTATIONS

"Accordingly, this action is summarily DISMISSED with prejudice, not on the merits, under Younger and for failure to exhaust state remedies."

"In this case, the legal standard for the issuance of a certificate of appealability has not been met."

FACTUAL BACKGROUND

Tyrone Maurice McBride filed a petition for habeas corpus relief under 28 U.S.C. § 2241. The magistrate judge concluded that McBride had failed to exhaust available state court remedies and that Younger abstention barred consideration of the merits while related state proceedings were ongoing. McBride filed no objections to the recommendation.

PROCEDURAL HISTORY

The matter was referred to United States Magistrate Judge William S. Brown for pretrial proceedings. The magistrate judge issued a Report and Recommendation on December 19, 2025, recommending summary dismissal based on failure to exhaust state remedies and Younger abstention. Petitioner did not object, and the district court accepted and incorporated the Report and Recommendation, dismissed the action with prejudice, and denied a certificate of appealability.

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 Ins.*, 416 F.3d 310, 315 (4th Cir. 2005)
- *Nivens v. Gilchrist*, 444 F.3d 237, 247 (4th Cir. 2006)
- *Lui v. Commission on Adult Establishments of Delaware*, 369 F.3d 319, 327 (3d Cir. 2004)
- *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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