

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF  
PENNSYLVANIA

Anthony E. Proctor v. Susquehanna Township Borough, et al.

Proctor · No. 1:24-CV-02008 · Decided February 17, 2026

SUMMARY

The United States District Court for the Middle District of Pennsylvania reviewed general objections to a magistrate judge’s report and recommendation concerning Anthony E. Proctor’s amended civil rights complaint. Finding no clear error or manifest injustice, the court adopted the report and recommendation and dismissed the amended complaint without leave to amend, including recommendations concerning the false-arrest, retaliation, and access-to-the-courts claims.

CASE DETAILS

|                       |                                                                                                                                                                                                                               |
|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Middle District of Pennsylvania                                                                                                                                                          |
| WRITING FOR THE COURT | Jennifer P. Wilson                                                                                                                                                                                                            |
| JURISDICTION          | United States District Court for the Middle District of Pennsylvania                                                                                                                                                          |
| DECIDED               | February 17, 2026                                                                                                                                                                                                             |
| DOCKET                | 1:24-CV-02008                                                                                                                                                                                                                 |
| DISPOSITION           | dismissed                                                                                                                                                                                                                     |
| PROCEDURAL POSTURE    | The district court reviewed Plaintiff's general objection to a magistrate judge's report and recommendation recommending dismissal of the amended complaint for failure to state a claim under 28 U.S.C. § 1915(e)(2)(B)(ii). |
| STANDARD OF REVIEW    | For general objections to a magistrate judge's report and recommendation, the district court reviews the record for clear error or manifest injustice rather than conducting de novo review.                                  |
| PRECEDENTIAL VALUE    | Unknown                                                                                                                                                                                                                       |
| PARTIES               | Anthony E. Proctor v. Susquehanna Township Borough, et al.                                                                                                                                                                    |

TOPICS

- civil procedure
- pleadings
- civil rights
- prisoners rights
- section 1983

PRACTICE AREAS

## QUESTIONS PRESENTED

1. Whether a district court must conduct de novo review when a party makes only general objections to a magistrate judge's report and recommendation.
2. Whether the record disclosed clear error or manifest injustice requiring rejection of the report and recommendation.
3. Whether the amended complaint should be dismissed without leave to amend.

## HOLDINGS

1. When a party raises only general objections to a magistrate judge's report and recommendation, the district court is not required to conduct de novo review and instead reviews the record for clear error or manifest injustice.
2. The report and recommendation was adopted because the district court found no clear error or manifest injustice on the face of the record.
3. The amended complaint was dismissed without leave to amend pursuant to the adopted report and recommendation.

## KEY QUOTATIONS

*“When a party raises only general objections to a report and recommendation, a district court is not required to conduct a de novo review of the report and recommendation.”*

*“The court has reviewed Judge Arbuckle’s report and recommendation and finds no clear error or manifest injustice on the face of the record.”*

## FACTUAL BACKGROUND

Plaintiff filed an amended civil-rights complaint arising from alleged false arrest, retaliation, and denial of access to the courts. The report and recommendation concluded that the amended complaint failed to state a claim and recommended dismissal under 28 U.S.C. § 1915(e)(2)(B)(ii). The district court found that Plaintiff's objection merely disagreed with the magistrate judge's analysis and reasserted the complaint's allegations.

## PROCEDURAL HISTORY

Retired Magistrate Judge William Arbuckle recommended dismissal of the amended complaint without leave to amend, while recommending that the false-arrest claims be dismissed without prejudice pending resolution of Plaintiff's criminal case and that retaliation and access-to-the-courts claims against Dauphin County Prison employees be dismissed without prejudice to refiling in a separate action. Plaintiff filed a difficult-to-read objection and amended complaint, which the district court liberally construed as a general objection. Applying clear-error and manifest-injustice review, the district court found no error, adopted the report and recommendation, and dismissed the amended complaint without leave to amend.

## DISPOSITION

dismissed

#### CASES CITED

- Goney v. Clark, 749 F.2d 5, 6–7 (3d Cir. 1984)
- Boomer v. Lewis, No. 3:06-CV-00850, 2009 WL 2900778, at \*1 (M.D. Pa. Sept. 9, 2009)

#### OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA ANTHONY E. PROCTOR,; Civil No. 1:24-CV-02008 Plaintiff,; v.: SUSQUEHANNA TOWNSHIP: BOROUGH, et al.,; Defendants.: Judge Jennifer P. Wilson  
MEMORANDUM Before the court is the report and recommendation of retired United States Magistrate Judge William Arbuckle recommending that Plaintiff’s amended complaint, Doc.

11, be dismissed pursuant to 28 U.S.C. § 1915(e)(2)(B)(ii) for failure to state a claim without leave to amend. (Doc. 12.) Judge Arbuckle further recommends that: (1) Plaintiff’s claim for false arrest against the police officers and relevant municipality should be dismissed without prejudice to Plaintiff’s ability to pursue that claim after his criminal case is resolved; and (2) Plaintiff’s claim for retaliation and access to the courts against Dauphin County Prison employees should be dismissed without prejudice to Plaintiff’s ability to pursue those claims in a separate action.

(Id.) Plaintiff filed an “objection to report and recommendation and an amended complaint,” which is difficult to read. (Doc. 13.) However, the court has carefully reviewed this document and will liberally construe it as general objection to the report and recommendation. When a party raises only general objections to a report and recommendation, a district court is not required to conduct a de novo review of the report and recommendation.

Goney v. Clark, 749 F.2d 5, 6–7 (3d Cir. 1984). “To obtain de novo determination of a magistrate’s findings by a district court, 28 U.S.C. § 636(b)(1) requires both timely and specific objections to the report.” Id. at 6.

Thus, when reviewing general objections to a report and recommendation, the court’s review is limited “to ascertaining whether there is ‘clear error’ or ‘manifest injustice’” on the face of the record. Boomer v. Lewis, No. 3:06-CV-00850, 2009 WL 2900778, at \*1 (M.D. Pa. Sept. 9, 2009).

The court has reviewed Judge Arbuckle’s report and recommendation and finds no clear error or manifest injustice on the face of the record. The objection, to the extent the court can read the handwriting, merely expresses disagreement with Judge Arbuckle’s analysis and reasserts the allegations contained in the complaint.

Accordingly, the court will adopt the report and recommendation, Doc. 12, and dismiss the amended complaint, Doc. 11, without leave to amend. An appropriate order will follow. s/Jennifer

P. Wilson JENNIFER P. WILSON United States District Judge Middle District of Pennsylvania  
Dated: February 17, 2026

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