

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH
CAROLINA

Randall Todd Smith v. M. V. Joseph, Warden

Smith v. Joseph · No. 0:25-cv-00708-JDA · Decided January 6, 2026

SUMMARY

The United States District Court for the District of South Carolina adopted the magistrate judge’s Report and Recommendation and granted the respondent’s motion for summary judgment in a pro se prisoner’s 28 U.S.C. § 2241 habeas petition. The court concluded that the petitioner had not produced evidence showing that the Bureau of Prisons incorrectly calculated his sentence and denied 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, Rock Hill Division
DECIDED	January 6, 2026
DOCKET	0:25-cv-00708-JDA
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner filed a pro se petition for a writ of habeas corpus under 28 U.S.C. § 2241. Respondent moved to dismiss or, alternatively, for summary judgment. After the magistrate judge recommended granting summary judgment and neither party objected, the district court reviewed the recommendation for clear error and adopted it.
STANDARD OF REVIEW	In the absence of specific objections to the magistrate judge's report and recommendation, the district court reviews the report for clear error. The court makes a de novo determination of portions to which specific objections are made.
PRECEDENTIAL VALUE	Unknown; district court opinion with no reporter citation
PARTIES	Randall Todd Smith v. M. V. Joseph, Warden

TOPICS

federal habeas corpus

summary judgment

post-conviction relief

civil procedure

PRACTICE AREAS

Federal habeas corpus

Post-conviction relief

Federal civil procedure

QUESTIONS PRESENTED

1. Whether the magistrate judge's recommendation to grant Respondent's motion for summary judgment contained clear error when neither party filed objections.
2. Whether Smith produced evidence sufficient to create a triable issue that the Bureau of Prisons incorrectly calculated his sentence.
3. Whether Smith was entitled to a certificate of appealability.

HOLDINGS

1. When no timely objection is filed to a magistrate judge's report and recommendation, the district court need not conduct de novo review and instead must satisfy itself that there is no clear error on the face of the record before accepting the recommendation.
2. Summary judgment should be granted because Smith failed to produce evidence from which a factfinder could reasonably conclude that the Bureau of Prisons incorrectly calculated his sentence.
3. A certificate of appealability should not issue because Smith did not make the required substantial showing of the denial of a constitutional right.

KEY QUOTATIONS

"in the absence of a timely filed objection, a district court need not conduct a de novo review, but instead must only satisfy itself that there is no clear error on the face of the record in order to accept the recommendation" (Opinion and Order text; citing *Diamond*, 416 F.3d at 315)

"Accordingly, Respondent's motion for summary judgment [Doc. 25] is GRANTED." (Conclusion)

FACTUAL BACKGROUND

Smith, a pro se state prisoner, challenged the Bureau of Prisons' calculation of his sentence through a petition under 28 U.S.C. § 2241. He opposed Respondent's motion to dismiss or for summary judgment but did not produce evidence sufficient to allow a factfinder reasonably to conclude that the Bureau of Prisons had incorrectly calculated his sentence.

PROCEDURAL HISTORY

The Clerk docketed Smith's § 2241 petition on February 7, 2025. Respondent moved to dismiss or for summary judgment, and Smith filed a response. The magistrate judge recommended granting the motion because Smith failed to produce evidence from which a factfinder could reasonably conclude that the Bureau of Prisons incorrectly calculated his sentence. With no objections filed, the district court reviewed the recommendation for clear error, accepted it, granted summary judgment, and denied a certificate of appealability.

DISPOSITION

other

CASES CITED

- Mathews v. Weber, 423 U.S. 261, 270–71 (1976)
- Diamond v. Colonial Life & Accident Ins., 416 F.3d 310, 315 (4th Cir. 2005)
- 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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