

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH
CAROLINA

Randolph Ashford v. T. Byrne (MD); P. Derrick (RN/HCA)

Ashford · No. 0:25-cv-1156-JFA-PJG · Decided March 12, 2026

SUMMARY

The United States District Court for the District of South Carolina reviewed Plaintiff Randolph Ashford’s objections to a Report and Recommendation concerning his motion for a preliminary injunction. The court overruled the objections, adopted the Report and Recommendation, denied the motion for a preliminary injunction, and recommitted the matter to the Magistrate Judge for further review.

CASE DETAILS

COURT	United States District Court for the District of South Carolina
WRITING FOR THE COURT	Joseph F. Anderson, Jr.
JURISDICTION	United States District Court for the District of South Carolina
DECIDED	March 12, 2026
DOCKET	0:25-cv-1156-JFA-PJG
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff objected to a magistrate judge's Report and Recommendation recommending denial of his motion for a preliminary injunction in a prisoner civil-rights action.
STANDARD OF REVIEW	The district court reviews specific objections to a magistrate judge's Report and Recommendation de novo and reviews unobjected-to portions, including portions subject only to general or conclusory objections, for clear error.
PRECEDENTIAL VALUE	unpublished district court order; precedential status unknown
PARTIES	Randolph Ashford v. T. Byrne (MD), P. Derrick (RN/HCA)

TOPICS

- injunctions
- prisoners rights
- civil rights
- civil procedure
- health law

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the district court properly reviewed the magistrate judge's Report and Recommendation under the de novo and clear-error standards.
2. Whether Plaintiff demonstrated a likelihood of success on the merits sufficient to warrant a preliminary injunction based on alleged deliberate indifference to his medical needs.

HOLDINGS

1. A district court must conduct de novo review of the portions of a magistrate judge's Report and Recommendation to which specific objections are made, while unobjected-to portions and portions challenged only by general or conclusory objections are reviewed for clear error.
2. A prisoner's disagreement with a medical provider's judgment, or negligent diagnosis or treatment, does not by itself establish deliberate indifference; Plaintiff therefore failed to show a likelihood of success on the merits and was not entitled to a preliminary injunction.

KEY QUOTATIONS

“However, the deliberate indifference standard “is not satisfied by ... mere disagreement concerning ‘[q]uestions of medical judgment,’ or mere negligence in diagnosis or treatment.”” (Section III)

“After a thorough review of the Report, the applicable law, and the record of this case, the Court finds no clear error in the Report.” (Section IV)

FACTUAL BACKGROUND

Plaintiff, a prisoner proceeding pro se, alleged that Defendants denied him constitutionally adequate medical care by failing to provide orthopedic shoes or inserts prescribed by another specialist. Defendant Byrne examined Plaintiff and concluded that orthopedic inserts were not necessary, and the Report noted that the South Carolina Department of Corrections must approve special shoes or insoles and that subjective pain ordinarily does not indicate a need for special footwear. The district court concluded that Plaintiff's disagreement with the medical judgment and services provided did not demonstrate constitutionally deficient care or a likelihood of success on the merits.

PROCEDURAL HISTORY

The case was referred to a magistrate judge for pretrial proceedings under 28 U.S.C. § 636(b) and Local Civil Rule 73.02(B)(2) (D.S.C.). The magistrate judge recommended denying Plaintiff's motion for a preliminary injunction because Plaintiff had not shown a likelihood of success on the merits. After reviewing Plaintiff's specific objections de novo and the remainder of the Report for clear error, the district court adopted the Report, denied the preliminary-injunction motion, and recommitted the matter to the magistrate judge for further review.

DISPOSITION

other

REMAND INSTRUCTIONS

The matter was recommitted to the magistrate judge for further review.

CASES CITED

- *Carniewski v. W. Virginia Bd. of Prob. & Parole*, 974 F.2d 1330 (4th Cir. 1992)
- *Camby v. Davis*, 718 F.2d 198, 199-200 (4th Cir. 1983)
- *Diamond v. Colonial Life & Acc. Ins. Co.*, 416 F.3d 310, 315-316 (4th Cir. 2005)
- *Dunlap v. TM Trucking of the Carolinas, LLC*, No. 0:15-cv-04009-JMC, 2017 WL 6345402, at *5 n.6 (D.S.C. Dec. 12, 2017)
- *One Parcel of Real Prop. Known as 2121 E. 30th St.*, 73 F.3d 1057, 1059 (10th Cir. 1996)
- *Workman v. Perry*, No. 6:17-cv-00765-RBH, 2017 WL 4791150, at *1 (D.S.C. Oct. 23, 2017)
- *Orpiano v. Johnson*, 687 F.2d 44, 47 (4th Cir. 1982)
- *Staley v. Norton*, No. 9:07-0288-PMD, 2007 WL 821181, at *1 (D.S.C. Mar. 2, 2007)
- *Howard v. Sec'y of Health and Human Servs.*, 932 F.2d 505, 509 (6th Cir. 1991)
- *Cruz v. Beto*, 405 U.S. 319 (1972)
- *Haines v. Kerner*, 404 U.S. 519 (1972)
- *United States v. Wilson*, 699 F.3d 789, 797 (4th Cir. 2012)
- *Germain v. Shearin*, 531 F. App'x 392, 395 (4th Cir. 2013)
- *Webb v. Hamidullah*, 281 F. App'x 159, 166 (4th Cir. 2008)

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