

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
VIRGINIA, RICHMOND DIVISION

Christopher Lumpkin v. Daugherty

Lumpkin · No. 3:23-cv-80-HEH · Decided December 22, 2025

SUMMARY

The United States District Court for the Eastern District of Virginia adopts a magistrate judge's Report and Recommendation in a § 1983 action brought by Virginia inmate Christopher Lumpkin against former corrections officer Daugherty. The court grants default judgment, awards \$3,000 in compensatory and punitive damages, and dismisses the action.

CASE DETAILS

COURT	United States District Court for the Eastern District of Virginia, Richmond Division
WRITING FOR THE COURT	Henry E. Hudson
JURISDICTION	United States District Court for the Eastern District of Virginia, Richmond Division
DECIDED	December 22, 2025
DOCKET	3:23-cv-80-HEH
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff moved for default judgment after the Clerk entered default against Defendant. The court reviewed and adopted the Magistrate Judge's Report and Recommendation, granted default judgment, awarded damages, and dismissed the action.
STANDARD OF REVIEW	Under 28 U.S.C. § 636(b)(1), the district court conducts de novo review of portions of a magistrate judge's report and recommendation to which a specific objection is made; absent a specific written objection, the court may adopt the recommendation without conducting de novo review.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion

TOPICS

- default judgment
- default
- section 1983
- cruel and unusual punishment
- prisoners rights

PRACTICE AREAS

civil procedure

civil rights

prisoners rights

constitutional law

remedies

QUESTIONS PRESENTED

1. Whether the district court should adopt the Magistrate Judge's Report and Recommendation when no objections were filed.
2. Whether Plaintiff was entitled to default judgment and an award of damages on his § 1983 Eighth Amendment claim.

HOLDINGS

1. Because Lumpkin filed no specific written objections, the court accepted and adopted the Magistrate Judge's Report and Recommendation without conducting de novo review.
2. The court granted Lumpkin's motion for default judgment and awarded him \$3,000 against Daugherty, consisting of \$2,000 in compensatory damages and \$1,000 in punitive damages.

KEY QUOTATIONS

"The recommendation has no presumptive weight, and the responsibility to make a final determination remains with this court."

"There being no objections, the Report and Recommendation (ECF No. 78) will be accepted and adopted."

FACTUAL BACKGROUND

Christopher Lumpkin, a Virginia inmate, alleged that former Sussex I State Prison corrections officer Daugherty subjected him to cruel and unusual punishment in violation of the Eighth Amendment. After default was entered against Daugherty, the Magistrate Judge held an evidentiary hearing and found that Lumpkin had sufficiently proven damages of \$2,000 in compensatory damages and \$1,000 in punitive damages.

PROCEDURAL HISTORY

Lumpkin, a Virginia inmate proceeding pro se, filed a 42 U.S.C. § 1983 action against Daugherty alleging an Eighth Amendment violation. The Clerk entered default on January 27, 2025. Following an evidentiary hearing, the Magistrate Judge recommended awarding \$3,000 in damages. Lumpkin filed no objections, and the district court adopted the recommendation, granted the motion for default judgment, awarded \$3,000, and dismissed the action.

DISPOSITION

dismissed

CASES CITED

- Estrada v. Witkowski, 816 F. Supp. 408, 410 (D.S.C. 1993)

- Mathews v. Weber, 423 U.S. 261, 270-71 (1976)
- Thomas v. Arn, 474 U.S. 140, 147 (1985)
- Diamond v. Colonial Life & Accident Insurance Co., 416 F.3d 310, 316 (4th Cir. 2005)

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