

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
TENNESSEE, EASTERN DIVISION

Tiffany Hensley v. Benton County Sheriff's Department, et al.

Hensley · No. No. 25-1104-STA-jay · Decided March 31, 2026

SUMMARY

The United States District Court for the Western District of Tennessee adopts the magistrate judge's Report and Recommendation concerning Defendant Bethany Wilson's motion to dismiss and Plaintiff Tiffany Hensley's requests for preliminary injunctive relief and reissued service. The court grants the motion to dismiss, denies the request for reissued service as moot, denies the preliminary injunction, and directs the clerk to terminate Wilson as a party.

CASE DETAILS

COURT	United States District Court for the Western District of Tennessee, Eastern Division
WRITING FOR THE COURT	S. Thomas Anderson
JURISDICTION	United States District Court for the Western District of Tennessee, Eastern Division
DECIDED	March 31, 2026
DOCKET	No. 25-1104-STA-jay
DISPOSITION	other
PROCEDURAL POSTURE	The district court reviewed a magistrate judge's report and recommendation addressing a defendant's motion to dismiss, the plaintiff's motion for a preliminary injunction and expedited relief, and the plaintiff's motion to reissue service.
STANDARD OF REVIEW	When no timely objection is filed to a magistrate judge's report and recommendation, the district court need only satisfy itself that there is no clear error on the face of the record before accepting the recommendation.
PRECEDENTIAL VALUE	unpublished

TOPICS

[motions to dismiss](#)

[injunctions](#)

[service of process](#)

[civil procedure](#)

PRACTICE AREAS

civil procedure

civil rights

equitable relief

QUESTIONS PRESENTED

1. What standard of review governs a magistrate judge's report and recommendation when no timely objection is filed?
2. Whether to adopt the magistrate judge's recommendation to grant Bethany Wilson's motion to dismiss, deny as moot the motion to reissue service, and deny the motion for a preliminary injunction.

HOLDINGS

1. When no timely objection is filed, the district court need only determine whether there is clear error on the face of the record before accepting the magistrate judge's recommendation.
2. The court adopted the Report and Recommendation in its entirety, granted Bethany Wilson's motion to dismiss, denied as moot Hensley's motion to reissue service on Wilson, denied Hensley's motion for a preliminary injunction, and terminated Wilson as a party.

KEY QUOTATIONS

"When no timely objection is filed, the court need only satisfy itself that there is no clear error on the face of the record in order to accept the recommendation."

"It does not appear that Congress intended to require district court review of a magistrate judge's factual or legal conclusions, under a de novo or any other standard, when neither party objects to those findings." (150)

FACTUAL BACKGROUND

Plaintiff Tiffany Hensley brought an action against the Benton County Sheriff's Department and others, including Bethany Wilson. Wilson moved to dismiss, while Hensley sought a preliminary injunction, expedited relief, and reissuance of service on Wilson in her official capacity. Hensley filed no objections to the magistrate judge's Report and Recommendation.

PROCEDURAL HISTORY

Magistrate Judge Jon A. York issued a Report and Recommendation on March 12, 2026, recommending that Defendant Bethany Wilson's motion to dismiss be granted, that the motion to reissue service be denied as moot, and that the motion for a preliminary injunction be denied. Plaintiff filed no timely objections. The district court adopted the Report and Recommendation in its entirety and directed the Clerk to terminate Wilson as a party.

DISPOSITION

other

CASES CITED

- Thomas v. Arn, 474 U.S. 140, 150 (1985)

OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
TENNESSEE EASTERN DIVISION

TIFFANY HENSLEY, Plaintiff, v. No. 25-1104-STA-jay BENTON COUNTY SHERIFF'S
DEPARTMENT, et al., Defendants.

ORDER ADOPTING MAGISTRATE JUDGE'S REPORT AND RECOMMENDATION

Before the Court is the United States Magistrate Judge's Report and Recommendation (ECF No. 43) concerning Defendant Bethany Wilson's motion to dismiss (ECF No. 24-25), Plaintiff Tiffany Hensley's motion for preliminary injunction and request for expedited relief (ECF No. 28), and Plaintiff's motion to reissue process on Defendant Wilson in her official capacity.

(ECF No. 35.) The Magistrate Judge has recommended and the Court agrees that Defendant Wilson's motion to dismiss be GRANTED and, as a result, Plaintiff's motion to reissue service on Defendant Wilson be DENIED AS MOOT and that Plaintiff's motion for preliminary injunction be DENIED.

The Magistrate Judge submitted his Report and Recommendation on March 12, 2026. Objections to the Report and Recommendation were due within fourteen days of the entry of the Report. To date Plaintiff has filed no objections to the Magistrate Judge's Report. (ECF No. 5.) "When no timely objection is filed, the court need only satisfy itself that there is no clear error on the face of the record in order to accept the recommendation." Fed.

R. Civ. P. 72 (Advisory Committee Notes to 1983 Amendment). Further, the Supreme Court stated in Thomas v. Arn, 474 U.S. 140, 150 (1985), "It does not appear that Congress intended to require district court review of a magistrate judge's factual or legal conclusions, under a de novo or any other standard, when neither party objects to those findings." Having reviewed the Magistrate Judge's Report and Recommendation and the entire record of the proceedings, the Court hereby ADOPTS the Report in its entirety.

The Clerk of the Court is DIRECTED to terminate Defendant Bethany Wilson as a party in this action. IT IS SO ORDERED. s/ S. Thomas Anderson S. THOMAS ANDERSON UNITED STATES DISTRICT JUDGE Date: March 31, 2026