

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

Schlam Stone & Dolan LLP v. TRG Global Corporation

Schlam Stone & Dolan LLP v. TRG Global Corporation · No. 1:24-cv-1318 (RDA/LRV) · Decided June 2, 2026

SUMMARY

The United States District Court for the Eastern District of Virginia adopted a magistrate judge’s Report and Recommendation and granted Schlam Stone & Dolan LLP’s motion for default judgment against TRG Global Corporation. The order directed entry of judgment for unpaid fees, accrued and continuing interest, and attorney’s fees and costs, and dismissed Count I.

CASE DETAILS

COURT	United States District Court for the Eastern District of Virginia, Alexandria Division
WRITING FOR THE COURT	Rossie D. Alston, Jr.
JURISDICTION	United States District Court for the Eastern District of Virginia, Alexandria Division
DECIDED	June 2, 2026
DOCKET	1:24-cv-1318 (RDA/LRV)
DISPOSITION	other
PROCEDURAL POSTURE	The district court reviewed a magistrate judge's Report and Recommendation recommending entry of default and default judgment for Plaintiff. No objections were filed.
STANDARD OF REVIEW	In the absence of objections to a magistrate judge's Report and Recommendation, the district court reviews the record for clear error rather than conducting de novo review.
PRECEDENTIAL VALUE	Unknown

TOPICS

- default judgment
- default
- damages
- attorney fees
- civil procedure

PRACTICE AREAS

- civil procedure
- commercial litigation
- contracts
- remedies

QUESTIONS PRESENTED

1. Whether the district court should approve and adopt the magistrate judge's Report and Recommendation when no objections were filed.
2. Whether Plaintiff was entitled to default judgment and entry of Rule 58 judgment for unpaid fees, interest, attorney's fees, and costs.

HOLDINGS

1. When no objections are filed to a magistrate judge's recommendation, the district court need not conduct de novo review and may accept the recommendation after satisfying itself that no clear error appears on the face of the record.
2. The court approved and adopted the Report and Recommendation, granted Plaintiff's motion for default judgment, entered default judgment in favor of Plaintiff and against Defendant on Counts I and II, dismissed Count I, and directed entry of Rule 58 judgment for the specified monetary amounts.

KEY QUOTATIONS

“in the absence of any objections to a Magistrate Judge’s Recommendation, the 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’”” (footnote)

FACTUAL BACKGROUND

Schlam Stone & Dolan LLP sought recovery from TRG Global Corporation for unpaid fees. The order awarded \$128,080.96 in unpaid fees, \$29,781.50 in accrued interest as of January 15, 2026, additional daily interest of \$31.58 until judgment, and \$67,762.23 in attorney's fees and costs.

PROCEDURAL HISTORY

Plaintiff moved for default judgment. Magistrate Judge Lindsey R. Vaala issued a Report and Recommendation recommending that the motion be granted and default be entered on Count II. After the objection deadline passed without objections, the district court reviewed the Report for clear error, approved and adopted it, granted the motions, entered default judgment, dismissed Count I, and directed entry of Rule 58 judgment for specified damages, interest, attorney's fees, and costs.

DISPOSITION

other

CASES CITED

- Diamond v. Colonial Life & Accident Insurance Co., 416 F.3d 310, 315 (4th Cir. 2005)