

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH
CAROLINA

Joel Shaffer v. Savannah River Nuclear Solutions

C/A No. 1:25-cv-4772-JFA-TER (D.S.C. Feb. 9, 2026) · No. C/A No. 1:25-cv-4772-JFA-TER · Decided
February 9, 2026

SUMMARY

The United States District Court for the District of South Carolina adopted a magistrate judge’s Report and Recommendation and granted the defendant’s motion to dismiss. The court held that the plaintiff’s Title VII religious-discrimination and failure-to-accommodate claims were barred by res judicata based on his participation in an earlier action challenging the defendant’s COVID-19 vaccine mandate. The case was dismissed without prejudice.

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	February 9, 2026
DOCKET	C/A No. 1:25-cv-4772-JFA-TER
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff objected to a magistrate judge's Report and Recommendation recommending dismissal of his Title VII claims on res judicata grounds. The district court conducted de novo review of the specifically challenged portions, reviewed the remainder for clear error, adopted the Report and Recommendation, granted Defendant's motion to dismiss, and dismissed the action without prejudice.
STANDARD OF REVIEW	The district court reviews de novo the portions of a magistrate judge's report to which a specific objection is made and reviews unobjected-to portions, including portions subject only to general or conclusory objections, for clear error. The court may accept, reject, or modify the recommendation.
PRECEDENTIAL VALUE	Unpublished district court memorandum opinion and order; persuasive but not precedential outside the case.

PARTIES

Joel Shaffer v. Savannah River Nuclear Solutions

TOPICS

res judicata

motions to dismiss

religious discrimination

title vii

civil procedure

PRACTICE AREAS

employment law

civil rights

civil procedure

employment discrimination

title vii

QUESTIONS PRESENTED

1. Whether Shaffer's Title VII religious-accommodation and disparate-treatment claims were barred by res judicata because they arose from the same transaction or series of transactions as the claims in the prior Rhoades action.
2. Whether Shaffer's Title VII claims were unavailable in Rhoades because he had not yet exhausted administrative remedies or received a right-to-sue notice.
3. Whether the magistrate judge properly considered filings and references to religious exemptions from the Rhoades action on a motion to dismiss.
4. Whether the magistrate judge improperly resolved factual inferences against Shaffer at the motion-to-dismiss stage.

HOLDINGS

1. Res judicata barred Shaffer's Title VII claims because Rhoades involved a final judgment on the merits, the same parties or their privies, and claims arising from the same transaction or series of transactions or core of operative facts.
2. The absence of a right-to-sue notice before termination of the prior action did not avoid claim preclusion because Shaffer could have asserted the Title VII claims in Rhoades and requested a stay while exhausting administrative remedies.
3. The magistrate judge properly considered filings in the Rhoades matter, including references to religious exemptions, without converting the motion to dismiss into one for summary judgment.
4. The objection was overruled because the Report and Recommendation analyzed whether the claims arose from the same transaction or series of transactions rather than improperly finding that the claims were literally identical.

KEY QUOTATIONS

“Res judicata precludes the assertion of a claim after a judgment on the merits in a prior suit by parties or their privies based on the same cause of action.” (Section II)

“Were we to focus on the claims asserted in each suit, we would allow parties to frustrate the goals of res judicata through artful pleading and claim splitting given that a single cause of action can manifest itself into

an outpouring of different claims, based variously on federal statutes, state statutes, and the common law.”
(Section III, Objection 1)

FACTUAL BACKGROUND

Shaffer asserted Title VII claims for failure to accommodate and disparate treatment based on religion arising from Savannah River Nuclear Solutions' COVID-19 vaccine mandate and related employment decisions. Shaffer had previously been one of seventy-nine plaintiffs in *Rhoades v. Savannah River Nuclear Solutions, LLC*, an action challenging the legality and enforceability of the vaccine mandate; that action was ultimately dismissed with prejudice. The district court concluded that Shaffer's present claims arose from the same transaction or series of transactions, or core of operative facts, as the Rhoades claims and could have been asserted there.

PROCEDURAL HISTORY

Shaffer filed this employment discrimination action in state court on April 30, 2024, and Defendant removed it to the District of South Carolina. Defendant moved to dismiss based on res judicata. The magistrate judge recommended granting the motion; Shaffer filed four objections, and Defendant replied. The district court overruled the objections, adopted the Report and Recommendation, granted the motion, and dismissed the case without prejudice.

DISPOSITION

dismissed

CASES CITED

- *Mathews v. Weber*, 423 U.S. 261 (1976)
- *Carniewski v. West Virginia Board of Probation & Parole*, 974 F.2d 1330 (4th Cir. 1992)
- *Camby v. Davis*, 718 F.2d 198, 199-200 (4th Cir. 1983)
- *Diamond v. Colonial Life & Accident Insurance Co.*, 416 F.3d 310, 315-16 (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)
- *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)
- *Meekins v. United Transportation Union*, 946 F.2d 1054, 1057 (4th Cir. 1991)
- *Pueschel v. United States*, 369 F.3d 345, 354-55 (4th Cir. 2004)
- *Pittston Co. v. United States*, 199 F.3d 694, 704 (4th Cir. 1999)
- *Waldman v. Village of Kiryas Joel*, 207 F.3d 105, 112 n.4 (2d Cir. 2000)
- *Hall v. St. Mary's Seminary & University*, 608 F. Supp. 2d 679, 688-89 (D. Md. 2009), *aff'd*, 378 F. App'x 326 (4th Cir. 2010)
- *Romer v. City of North Charleston*, No. 2:22-CV-04254-DCN, 2024 WL 4343709, at *7 (D.S.C. Sept. 30, 2024)

- Young-Henderson v. Spartanburg Area Mental Health Center, 945 F.2d 770, 775 (4th Cir. 1991)
- Zak v. Chelsea Therapeutics International, Ltd., 780 F.3d 597, 607 (4th Cir. 2015)
- Colonial Penn Insurance Co. v. Coil, 887 F.2d 1236, 1239 (4th Cir. 1989)

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