

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
FLORIDA

Sylena Lydia Dryden v. Judge Michael Lynch, et al.

Dryden · No. 26-60536-CIV-DAMIAN/Augustin-Birch · Decided May 6, 2026

SUMMARY

The United States District Court for the Southern District of Florida affirmed and adopted a magistrate judge’s report and recommendation concerning Sylena Lydia Dryden’s pro se civil-rights complaint under 42 U.S.C. § 1983. The court dismissed the complaint without prejudice and with leave to amend because the allegations were largely illegible and did not comply with Federal Rules of Civil Procedure 8 and 10, while dismissing claims against the Paul Rein Detention Facility and North Broward Bureau Detention Facility with prejudice because those entities lacked capacity to be sued. The court overruled the plaintiff’s generalized objections, set a deadline for an amended complaint, and closed the case for administrative and statistical purposes pending amendment.

CASE DETAILS

COURT	United States District Court for the Southern District of Florida
WRITING FOR THE COURT	Melissa Damian
JURISDICTION	United States District Court for the Southern District of Florida
DECIDED	May 6, 2026
DOCKET	26-60536-CIV-DAMIAN/Augustin-Birch
DISPOSITION	other
PROCEDURAL POSTURE	The district court reviewed a magistrate judge's report and recommendation after the pro se plaintiff filed generalized objections to the recommended dismissal of her in forma pauperis civil-rights complaint.
STANDARD OF REVIEW	De novo review applies to properly specific objections to a magistrate judge's dispositive recommendation; when objections are not timely and specific, the district court reviews for clear error on the face of the record.
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	Sylena Lydia Dryden v. Judge Michael Lynch, Judge Ari Abraham Porth, Broward Public Defender's Office, Paul Rein Detention Facility,

TOPICS

pleadings civil procedure section 1983 civil rights

PRACTICE AREAS

civil procedure civil rights constitutional law

QUESTIONS PRESENTED

1. Whether generalized objections to a magistrate judge's report and recommendation require de novo review or only clear-error review.
2. Whether the complaint should be dismissed under 28 U.S.C. § 1915(e)(2) because it was largely illegible and failed to comply with Federal Rules of Civil Procedure 8 and 10.
3. Whether Paul Rein Detention Facility and North Broward Bureau Detention Facility could be sued as entities lacking legal capacity to be sued.
4. Whether Plaintiff should be granted leave to amend.

HOLDINGS

1. Because Plaintiff's objections were generalized, conclusory, and did not identify specific factual or legal errors, the district court was required only to review the report and recommendation for clear error on the face of the record rather than conduct de novo review.
2. The complaint was properly dismissed without prejudice and with leave to amend because it was largely illegible and failed to comply with Federal Rules of Civil Procedure 8 and 10.
3. Paul Rein Detention Facility and North Broward Bureau Detention Facility were dismissed with prejudice because they lacked legal capacity to be sued.
4. Plaintiff was permitted to file an amended complaint by May 21, 2026, subject to compliance with the Report's instructions and Rules 8 and 10.

KEY QUOTATIONS

"Parties filing objections to a magistrate's report and recommendation must specifically identify those findings objected to." (Discussion)

"If the Amended Complaint contains the same deficiencies addressed in the Report and in this Order, future dismissal may be with prejudice." (Order paragraph 3)

FACTUAL BACKGROUND

Plaintiff, proceeding pro se, alleged that Broward County Sheriff's officers threatened, beat, and stalked her; that detention facilities denied her access to a law library, forms, and grievance procedures; and that medical and

mental-health providers administered medication without consent and withheld records. She also asserted claims concerning the public defender's office and two state-court judges, and sought damages, injunctive relief, and criminal charges against a police officer. The complaint was handwritten, largely illegible, and did not organize factual allegations and legal claims into the numbered paragraphs and separate counts required by the Federal Rules of Civil Procedure.

PROCEDURAL HISTORY

Plaintiff filed a 42 U.S.C. § 1983 complaint and an application to proceed in forma pauperis. The magistrate judge granted in forma pauperis status and recommended dismissal under 28 U.S.C. § 1915(e)(2), generally without prejudice and with leave to amend because the complaint was largely illegible and did not comply with Federal Rules of Civil Procedure 8 and 10, while recommending dismissal with prejudice as to the detention facilities because they lacked capacity to be sued. The district court found the objections generalized and reviewed the report for clear error, affirmed and adopted it, dismissed the complaint without prejudice with leave to amend, dismissed the two detention facilities with prejudice, and set an amendment deadline.

DISPOSITION

other

CASES CITED

- Wilk v. St. Lucie Cnty. Fla. Sheriff Off., 740 F. App'x 658, 662 (11th Cir. 2018)
- United States v. Schultz, 565 F.3d 1353, 1361 (11th Cir. 2009)
- Marsden v. Moore, 847 F.2d 1536, 1548 (11th Cir. 1988)
- Melillo v. United States, No. 17-CV-80489, 2018 WL 4258355, at *1 (S.D. Fla. Sept. 6, 2018)
- Marlite, Inc. v. Eckenrod, No. 10-23641-CIV, 2012 WL 3614212, at *2 (S.D. Fla. Aug. 21, 2012)
- Camardo v. Gen. Motors Hourly-Rate Emps. Pension Plan, 806 F. Supp. 380, 382 (W.D.N.Y. 1992)
- Lewis v. Mavis Tire & Auto Corp., No. 25-cv-60659, 2025 WL 1854699, at *3 (S.D. Fla. July 3, 2025)
- United States v. Ogiekpolor, 122 F.4th 1296, 1304 (11th Cir. 2024)
- Campbell v. Air Jamaica Ltd., 760 F.3d 1165, 1168-69 (11th Cir. 2014)
- Keaton v. United States, No. 14-21230-CIV, 2015 WL 12780912, at *1 (S.D. Fla. May 4, 2015)
- Lopez v. Berryhill, No. 17-CV-24263, 2019 WL 2254704, at *2 (S.D. Fla. Feb. 26, 2019)
- Davis v. Apfel, 93 F. Supp. 2d 1313, 1317 (M.D. Fla. 2000)