

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WASHINGTON

Jane Doe 1, et al. v. Alondra Guzman

No. 2:25-cv-00431-RSL (W.D. Wash. Feb. 3, 2026) · No. 2:25-cv-00431-RSL · Decided February 3, 2026

SUMMARY

The United States District Court for the Western District of Washington denied Alondra Guzman’s motion to compel joinder of Washington and state agencies as necessary parties, to exercise supplemental jurisdiction over related state-law claims, or alternatively to stay the federal proceeding. The court held that complete relief could be obtained against Guzman individually, that supplemental jurisdiction could not be used to compel claims not brought in federal court, and that comity favored allowing the related state-court action to proceed. The court also found no sufficient basis for staying the federal § 1983 claims.

CASE DETAILS

COURT	United States District Court for the Western District of Washington
WRITING FOR THE COURT	Robert S. Lasnik
JURISDICTION	United States District Court for the Western District of Washington
DECIDED	February 3, 2026
DOCKET	2:25-cv-00431-RSL
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved under Federal Rule of Civil Procedure 19 to compel joinder of the State of Washington and several state agencies, requested supplemental jurisdiction over related state-law claims pending in state court, and alternatively sought a stay of the federal § 1983 action.
PRECEDENTIAL VALUE	unknown

TOPICS

- joinder
- subject matter jurisdiction
- comity
- section 1983
- civil procedure

PRACTICE AREAS

- civil procedure
- civil rights
- constitutional law
- federal courts
- federalism

QUESTIONS PRESENTED

1. Whether Washington and its agencies were required parties under Federal Rule of Civil Procedure 19(a).
2. Whether the federal court could or should exercise supplemental jurisdiction over state-law claims that plaintiffs had filed only in a separate state-court action.
3. Whether the federal § 1983 action should be stayed pending resolution of the related state-court litigation.

HOLDINGS

1. The State of Washington and its agencies were not required parties because the court could accord complete relief between the existing parties, and the separate lawsuits did not create a substantial risk of double, multiple, or inconsistent obligations on the facts then presented.
2. The court could not use supplemental jurisdiction under 28 U.S.C. § 1367 to compel plaintiffs to bring state-law claims that were not before the federal court, and plaintiffs were not required to assert all claims in a single lawsuit.
3. A stay was not warranted because Guzman was not a party to the state action, the claims were distinct, and the asserted possibility that the state-court result might be informative was insufficient justification.

KEY QUOTATIONS

“These concerns do not justify compelled joinder, however, or stripping state law claims from a state court that indisputably has jurisdiction over them.” (at 3)

“Nor were plaintiffs required to assert all of their claims in a single lawsuit.” (at 4)

FACTUAL BACKGROUND

Plaintiffs alleged that Guzman, an employee and agent of Washington's Department of Children, Youth, and Families, deliberately, consciously, or recklessly investigated child abuse and concealed exculpatory evidence during a legal removal process. They sought damages for constitutional and statutory violations under 42 U.S.C. § 1983. Plaintiffs separately sued Washington and its agencies in King County Superior Court on state-law claims arising from the same nucleus of operative facts.

PROCEDURAL HISTORY

Plaintiffs filed this federal action against Alondra Guzman alleging constitutional and statutory violations under 42 U.S.C. § 1983. Less than a week earlier, plaintiffs had filed a separate state-court action against the State of Washington and related agencies involving state-law claims arising from the same general events. The federal court denied the motion to compel joinder, declined to exercise supplemental jurisdiction, and denied the requested stay.

DISPOSITION

other

CASES CITED

- Finney v. Farmers Ins. Co., 92 Wn.2d 748, 754 (1979)
- Eastwood v. Horse Harbor Found., Inc., 170 Wn.2d 380, 400 (2010)
- The Fair v. Kohler Die & Specialty Co., 228 U.S. 22, 25 (1913)
- Newtok Vill. v. Patrick, 21 F.4th 608, 616 (9th Cir. 2021)
- Gilbertson v. Albright, 381 F.3d 965, 970 (9th Cir. 2004)

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