

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OHIO

Nathan M. Ahrens v. Summit County Clerk of Courts, et al.

Ahrens · No. 5:26-cv-00100 · Decided February 24, 2026

SUMMARY

The United States District Court for the Northern District of Ohio dismissed Nathan M. Ahrens's pro se civil rights complaint under 28 U.S.C. § 1915(e)(2)(B). The court held that the allegations were incomprehensible, that the Rooker–Feldman doctrine barred review of state-court rulings, and that certain defendants were immune or not state actors under § 1983. The court also denied the motion for temporary and preliminary injunctive relief and certified that an appeal could not be taken in good faith.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio
WRITING FOR THE COURT	John R. Adams
JURISDICTION	United States District Court for the Northern District of Ohio
DECIDED	February 24, 2026
DOCKET	5:26-cv-00100
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se plaintiff brought a civil-rights action under 42 U.S.C. § 1983, moved to proceed in forma pauperis, and sought temporary and preliminary injunctive relief. The district court granted in forma pauperis status, screened the complaint under 28 U.S.C. § 1915(e)(2)(B), dismissed the complaint sua sponte, and denied injunctive relief.
STANDARD OF REVIEW	Under 28 U.S.C. § 1915(e)(2)(B), the court must screen an in forma pauperis complaint and dismiss it before service if it is frivolous or malicious, fails to state a claim, or seeks monetary relief from an immune defendant. Pro se pleadings receive liberal construction, but pro se litigants must satisfy basic pleading requirements. A complaint must contain sufficient factual matter to state a plausible claim and provide fair notice of the claims and their grounds.
PRECEDENTIAL VALUE	Unpublished district court memorandum opinion and order; precedential status is unknown.

PARTIES

Nathan M. Ahrens v. Summit County Clerk of Courts, Judge Susan Baker Ross, Portage Path Psychiatric Emergency Services

TOPICS

section 1983 civil rights subject matter jurisdiction motions to dismiss injunctions

PRACTICE AREAS

Civil rights Federal jurisdiction Civil procedure Appellate procedure Remedies

QUESTIONS PRESENTED

1. Whether the complaint stated a plausible federal claim and satisfied basic federal notice-pleading requirements.
2. Whether the Rooker-Feldman doctrine deprived the district court of jurisdiction over claims seeking review or reversal of state-court decisions.
3. Whether Judge Ross and the Summit County Clerk of Courts were immune from damages liability under 42 U.S.C. § 1983 for acts performed in their official judicial or quasi-judicial functions.
4. Whether Portage Path Psychiatric Emergency Services could be sued under § 1983 absent allegations that it acted under color of state law.
5. Whether plaintiff was entitled to temporary or preliminary injunctive relief.

HOLDINGS

1. The complaint was properly dismissed because its allegations were so unclear and incomprehensible that they failed to meet basic federal notice-pleading requirements and did not suggest a plausible federal claim against any defendant.
2. The Rooker-Feldman doctrine barred the district court from exercising jurisdiction over claims alleging error in the state-court decisions, and plaintiff was required to seek relief in the Ohio appellate courts.
3. Judge Ross and the Summit County Clerk of Courts were entitled to absolute immunity from a damages suit under § 1983 for actions taken in the performance of their official functions in state-court proceedings.
4. Portage Path Psychiatric Emergency Services could not be subjected to § 1983 liability absent facts showing that it acted under color of state law.
5. The motion for a temporary restraining order and preliminary injunction was denied because the underlying complaint was dismissed and did not present a viable claim warranting injunctive relief.

KEY QUOTATIONS

“Federal district courts do not stand as appellate courts for decisions of state courts.” (3)

“It is well established that judges and other court officers enjoy absolute immunity from suit on claims arising out of the performance of judicial or quasi-judicial functions.” (3)

FACTUAL BACKGROUND

Nathan Ahrens filed a pro se § 1983 action against the Summit County Clerk of Courts, Judge Susan Baker Ross, and Portage Path Psychiatric Emergency Services. The complaint appeared to challenge rulings and the reopening of a case in two state-court proceedings involving Portage Path. Ahrens sought millions of dollars in damages and an order staying the state-court proceeding identified as Case No. CV-2025-11-5527.

PROCEDURAL HISTORY

Ahrens filed a § 1983 complaint challenging rulings in state-court cases and sought millions of dollars in damages and a stay of one state-court proceeding. He also moved to proceed in forma pauperis and for a temporary restraining order and preliminary injunction. The court granted in forma pauperis status, dismissed the complaint before service under § 1915(e)(2)(B), denied the injunction motion, and certified that an appeal could not be taken in good faith.

DISPOSITION

dismissed

CASES CITED

- Ahrens v. Psychiatric Emergency Services, No. CV-2025-11-5527 (Summit Cty. Ct. of Common Pleas)
- Ahrens v. Portage Path Emergency Services, No. CV-2024-04-1734 (Summit Cty. Ct. of Common Pleas)
- Williams v. Curtin, 631 F.3d 380, 383 (6th Cir.)
- Pilgrim v. Littlefield, 92 F.3d 413, 416 (6th Cir.)
- Erwin v. Edwards, 22 F. App'x 579, 580 (6th Cir.)
- Hill v. Lappin, 630 F.3d 468, 470-71 (6th Cir.)
- Ashcroft v. Iqbal, 556 U.S. 662 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555 (2007)
- Swierkiewicz v. Sorema N.A., 534 U.S. 506, 514 (2002)
- Lillard v. Shelby Cty. Bd. of Educ., 76 F.3d 716, 726 (6th Cir.)
- Hall v. Callahan, 727 F.3d 450, 453 (6th Cir.)
- Foster v. Walsh, 864 F.2d 416, 417 (6th Cir.)
- Adams v. Vandemark, 855 F.2d 312, 317 (6th Cir.)