

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
FLORIDA

Lutricia Lushan Brown Allen v. Hon. Deborah Carpenter-Toye, et al.

Brown Allen · No. No. 26-60344-CIV-SINGHAL · Decided February 10, 2026

SUMMARY

The United States District Court for the Southern District of Florida dismissed the plaintiff’s action challenging ongoing state criminal proceedings and seeking a temporary restraining order and preliminary injunction. The court held that Younger abstention applied because the state proceedings were pending, involved important state interests, and provided an adequate forum for the plaintiff’s constitutional claims. The complaint was dismissed without prejudice, the motion was denied, and the case was closed.

CASE DETAILS

COURT	United States District Court for the Southern District of Florida
WRITING FOR THE COURT	Raag Singhal
JURISDICTION	United States District Court for the Southern District of Florida
DECIDED	February 10, 2026
DOCKET	No. 26-60344-CIV-SINGHAL
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff filed a federal action challenging ongoing state criminal proceedings and moved for a temporary restraining order and preliminary injunction to stay those proceedings. The district court sua sponte reviewed its jurisdiction and dismissed the complaint without prejudice under Younger abstention, denying the motion and denying other pending motions as moot.
STANDARD OF REVIEW	The court independently reviewed subject matter jurisdiction and applied the Younger abstention doctrine; it stated that a federal court may dismiss sua sponte when jurisdiction is lacking.
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	Lutricia Lushan Brown Allen v. Hon. Deborah Carpenter-Toye, et al.

TOPICS

subject matter jurisdiction

injunctions

civil procedure

due process

criminal procedure

PRACTICE AREAS

civil procedure

constitutional law

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federal courts

QUESTIONS PRESENTED

1. Whether the federal court was required to abstain under *Younger v. Harris* from exercising jurisdiction over Plaintiff's challenge to ongoing state criminal proceedings.
2. Whether any exception to *Younger* abstention applied based on bad faith, irreparable injury, or the alleged inadequacy of the state forum.
3. Whether Plaintiff was entitled to a temporary restraining order or preliminary injunction staying the state criminal proceedings.

HOLDINGS

1. The court must abstain from exercising jurisdiction over a federal action challenging ongoing state criminal proceedings when judicial state proceedings are pending, important state interests are implicated, and the state proceedings provide an adequate opportunity to raise constitutional claims.
2. None of the narrow exceptions to *Younger* abstention applied because the record showed no bad-faith prosecution, no irreparable injury that could not be addressed in the state proceedings, and no inadequacy in the state forum for raising Plaintiff's constitutional claims.
3. A federal district court may dismiss an action sua sponte when an abstention doctrine establishes that the court lacks jurisdiction to proceed.

KEY QUOTATIONS

"Abstention 'is required when: (1) state proceedings, judicial in nature, are pending; (2) the state proceedings involve important state interests; and (3) the state proceedings afford adequate opportunity to raise the constitutional issue.'" (II)

*"This Court must abstain from exercising jurisdiction over this matter under *Younger*."* (III)

FACTUAL BACKGROUND

On November 25, 2024, Plaintiff was stopped for driving with an improper license plate bearing references to "Traveler" and UCC provisions. After the officer requested her driver's license and asked her to exit the vehicle, Plaintiff refused, physically tensed, and was arrested. She was charged with failing to register a motor vehicle, attaching an unassigned license plate, and resisting arrest, with a state jury trial scheduled for February 11, 2026. Plaintiff then filed this federal action challenging the state court's jurisdiction and asserting violations of constitutional rights, including the Sixth Amendment and due process.

PROCEDURAL HISTORY

Plaintiff was charged in state court with failing to register a motor vehicle, attaching an unassigned license plate, and resisting arrest. Her state jury trial was scheduled for February 11, 2026. She filed this federal action on February 9, 2026, asserting constitutional and jurisdictional challenges to the state prosecution and seeking emergency injunctive relief. The district court dismissed the complaint without prejudice under Younger abstention and denied the requested injunction.

DISPOSITION

dismissed

CASES CITED

- Younger v. Harris, 401 U.S. 37 (1971)
- Johnson v. Fla., 32 F.4th 1092, 1099-1100, 1102 (11th Cir. 2022)
- Shepherd v. U.S. Bank Nat'l Ass'n, as Tr. for Structured Asset Inv. Loan Tr. Mortg. Pass-Through Certificates, Servs. 2005-4, 839 F. App'x 304, 305 (11th Cir. 2020)

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