

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Strawn v. Sonneveld

Strawn · No. No. 2:25-CV-01809-DAD-DMC · Decided August 7, 2025

SUMMARY

The United States District Court for the Eastern District of California screened a pro se complaint challenging a Washington state-court judgment involving child custody, property, and a domestic-violence protection order. The court held that claims alleging legal error by the state court and seeking relief from its judgment were barred by the Rooker-Feldman doctrine, while allowing amendment regarding an allegedly fraudulent representation if that issue had not been addressed on the merits in state court. The original complaint was dismissed with leave to amend within 30 days.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Dennis M. Cota
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	August 7, 2025
DOCKET	No. 2:25-CV-01809-DAD-DMC
DISPOSITION	dismissed
PROCEDURAL POSTURE	Screening order on an in forma pauperis civil-rights complaint; the court dismissed the original complaint with leave to amend.
STANDARD OF REVIEW	De novo jurisdictional screening under 28 U.S.C. § 1915(e)(2) and Federal Rule of Civil Procedure 12(h)(3); the court assessed whether the complaint was frivolous, failed to state a claim, sought relief from an immune defendant, or invoked federal subject-matter jurisdiction.
PRECEDENTIAL VALUE	Unpublished, nonprecedential district-court screening order
PARTIES	Melissa Ann Strawn v. Jord Sonneveld

TOPICS

- subject matter jurisdiction
- civil procedure
- section 1983
- fourteenth amendment
- injunctions

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Rooker-Feldman barred federal jurisdiction over claims alleging that the Washington state court denied continuances and issued a judgment conflicting with a prior protective order.
2. Whether the alleged extrinsic fraud or fraudulent testimony claim was necessarily barred when the complaint did not establish whether the Washington court addressed that issue on the merits.
3. Whether Plaintiff should receive leave to amend before dismissal of the entire action.

HOLDINGS

1. Rooker-Feldman barred jurisdiction over claims alleging that the Washington court denied continuances or issued a decision conflicting with a prior protective order because Plaintiff sought relief from the state-court judgment and alleged legal errors by that court.
2. The court could not determine from the complaint whether Rooker-Feldman barred the extrinsic-fraud claim; if the claim was raised and decided on the merits in state court, it would be barred, but if the state court did not address its merits, Rooker-Feldman might not apply.
3. The original complaint was dismissed with leave to amend because some deficiencies might be cured by amendment, while claims identified as incurable would not receive leave to amend.

KEY QUOTATIONS

“Under the Rooker-Feldman abstention doctrine, federal courts lack jurisdiction to hear matters already decided in state court.” (at 2)

“Rooker-Feldman thus applies only when the federal plaintiff both asserts as her legal error or errors by the state court and seeks as her remedy relief from the state court judgment.” (at 3)

“Extrinsic fraud on a court is, by definition, not an error by that court. It is, rather, a wrongful act committed by the party or parties who engaged in the fraud.” (at 4)

FACTUAL BACKGROUND

Plaintiff alleged that the King County, Washington court ordered the sale of her California home, allowed Defendant to retrieve property from the home, and awarded Defendant sole custody of Plaintiff's three children. She claimed that she could not participate because of medical incapacitation and that the state-court determination rested on Defendant's allegedly false testimony. She sought federal injunctive and declaratory relief preventing enforcement of the Washington judgment and an existing domestic-violence protection order.

PROCEDURAL HISTORY

Plaintiff filed the complaint on June 28, 2025, and sought a temporary restraining order to prevent enforcement of a Washington state-court judgment and domestic-violence protection order. The district judge denied the temporary restraining order, citing Rooker-Feldman abstention. The magistrate judge screened the complaint under 28 U.S.C. § 1915(e)(2) and Federal Rule of Civil Procedure 12(h)(3), concluded that most claims were

barred because they sought review of alleged errors in the Washington judgment, and dismissed the complaint with leave to amend the potentially viable extrinsic-fraud claim.

DISPOSITION

dismissed

CASES CITED

- 28 U.S.C. § 1915(e)(2)
- *Rooker v. Fidelity Trust Co.*, 263 U.S. 413 (1923)
- *District of Columbia Court of Appeals v. Feldman*, 460 U.S. 462 (1983)
- *Exxon Mobil Corp. v. Saudi Basic Industries Corp.*, 544 U.S. 280 (2005)
- *Bell v. City of Boise*, 709 F.3d 890, 897 (9th Cir. 2013)
- *Kougasian v. TMSL, Inc.*, 359 F.3d 1136, 1140-41 (9th Cir. 2004)
- *Reusser v. Wachovia Bank, N.A.*, 525 F.3d 855, 860 (9th Cir. 2008)
- *Besoyan v. Sacramento Cnty.*, No. 2:16-cv-00046-KJM-EFB, 2017 WL 1361655 (E.D. Cal. Jan. 27, 2017)
- *Lopez v. Smith*, 203 F.3d 1122, 1126, 1131 (9th Cir. 2000) (en banc)
- *Ferdik v. Bonzelet*, 963 F.2d 1258, 1260-62 (9th Cir. 1992)
- *King v. Atiyeh*, 814 F.2d 565, 567 (9th Cir. 1987)
- *Ellis v. Cassidy*, 625 F.2d 227 (9th Cir. 1980)
- *May v. Enomoto*, 633 F.2d 164, 167 (9th Cir. 1980)
- *Johnson v. Duffy*, 588 F.2d 740, 743 (9th Cir. 1978)
- *Neviyel v. North Coast Life Ins. Co.*, 651 F.2d 671, 673 (9th Cir. 1981)

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