

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
CALIFORNIA

Oliver v. Napa County District Attorney Employee(s), et al.

Oliver · No. 25-cv-02769-WHO · Decided July 18, 2025

SUMMARY

The United States District Court for the Northern District of California granted the Judicial Defendants’ motion to dismiss David Jerome Oliver’s Third Amended Complaint with prejudice. The court held that it lacked subject-matter jurisdiction under the Rooker-Feldman doctrine or, for ongoing state proceedings, required abstention under Younger, and it alternatively concluded that the judicial defendants were protected by judicial immunity. The court denied Oliver’s motions for summary judgment and to vacate as moot and vacated the County Defendants’ motion to dismiss.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	William H. Orrick
JURISDICTION	United States District Court for the Northern District of California
DECIDED	July 18, 2025
DOCKET	25-cv-02769-WHO
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff proceeding pro se brought a civil action under 42 U.S.C. § 1983 and related constitutional theories seeking damages and injunctive relief based on state-court criminal proceedings. Judicial Defendants moved to dismiss, while plaintiff moved for summary judgment and to vacate or set aside state-court judgments.
STANDARD OF REVIEW	On a facial Rule 12(b)(1) challenge, the court accepts the complaint's jurisdictional allegations as true and draws reasonable inferences for the plaintiff; on a factual Rule 12(b)(1) challenge, the court may consider evidence outside the complaint without converting the motion to summary judgment. Under Rule 12(b)(6), the court accepts well-pleaded allegations as true but disregards conclusory allegations, unwarranted factual deductions, and unreasonable inferences. Summary judgment is proper when there is no genuine dispute of material fact and the movant is entitled to judgment as a matter of law.

PRECEDENTIAL VALUE	nonprecedential
PARTIES	David Jerome Oliver v. Napa County District Attorney Employee(s), et al.

TOPICS

subject matter jurisdiction motions to dismiss section 1983 civil procedure appellate jurisdiction

PRACTICE AREAS

Civil rights Federal civil procedure Constitutional law Criminal procedure

QUESTIONS PRESENTED

1. Whether the federal district court had subject-matter jurisdiction to review or nullify the state-court proceedings and judgments challenged by Oliver.
2. Whether Younger abstention barred federal injunctive or declaratory relief if the challenged state proceedings were ongoing.
3. Whether the claims against the Judicial Defendants were barred by judicial immunity.
4. Whether Oliver's motions for summary judgment and to vacate or set aside the state-court judgments could be granted.

HOLDINGS

1. The federal district court lacked subject-matter jurisdiction to consider Oliver's claims because, to the extent he sought to nullify a final state-court judgment, the Rooker-Feldman doctrine required him to pursue relief through the state appellate process.
2. If Oliver was challenging ongoing state judicial proceedings, Younger abstention independently required the federal court to refrain from granting injunctive or declaratory relief.
3. The Judicial Defendants were entitled to absolute judicial immunity because the challenged conduct was judicial in nature and was not taken in the clear absence of all jurisdiction.
4. Federal Rule of Civil Procedure 60(b) does not provide a basis for federal subject-matter jurisdiction or authorize a federal district court to vacate a state-court judgment.

KEY QUOTATIONS

“Federal courts are courts of limited jurisdiction” (at 3)

“Absent extraordinary circumstances, abstention in favor of state judicial proceedings is required if the state proceedings (1) are ongoing, (2) implicate important state interests, and (3) provide the plaintiff an adequate opportunity to litigate federal law claims.” (at 4)

“A judge will not be deprived of immunity because the action he took was in error, was done maliciously, or was in excess of his authority; rather, he will be subject to liability only when he has acted in the ‘clear

absence of all jurisdiction.’’ (at 4)

FACTUAL BACKGROUND

Oliver alleged that Napa County criminal proceedings and arrests against him were based on a purported Stanislaus County restraining order and case number that he believed were nonexistent or void. He alleged arrests in 2014 and 2025, prosecution for violating the order, bail amounts of \$10,000 and \$15,000, and supervised probation. He sued Napa County judges, prosecutors, public defenders, and related entities, asserting equal-protection, excessive-bail, cruel-and-unusual-punishment, and due-process claims and seeking damages and injunctive relief.

PROCEDURAL HISTORY

Oliver filed suit on March 24, 2025, and later filed a Third Amended Complaint. He moved for summary judgment and for an order vacating or setting aside state-court judgments. The Judicial Defendants moved to dismiss; the County Defendants later filed a separate motion to dismiss. After a July 16, 2025 hearing, the court granted the Judicial Defendants' motion, dismissed the Third Amended Complaint with prejudice, denied plaintiff's motions as moot, vacated the County Defendants' motion to dismiss, and directed entry of judgment for all defendants.

DISPOSITION

dismissed

CASES CITED

- Kokkonen v. Guardian Life of America, 511 U.S. 375, 377 (1994)
- Safe Air for Everyone v. Meyer, 373 F.3d 1035, 1039 (9th Cir. 2004)
- Wolfe v. Strankman, 392 F.3d 358, 362 (9th Cir. 2004)
- Savage v. Glendale Union High School District No. 205, 343 F.3d 1036, 1040 n.2 (9th Cir. 2003)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555, 570 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Usher v. City of Los Angeles, 828 F.2d 556, 561 (9th Cir. 1987)
- In re Gilead Sciences Securities Litigation, 536 F.3d 1049, 1055 (9th Cir. 2008)
- Lopez v. Smith, 203 F.3d 1122, 1127 (9th Cir. 2000)
- Moore v. Kayport Package Express, 885 F.2d 531, 538 (9th Cir. 1989)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Bretz v. Kelman, 773 F.2d 1026, 1027 n.1 (9th Cir. 1985) (en banc)
- Ivey v. Board of Regents of University of Alaska, 673 F.2d 266, 268 (9th Cir. 1982)
- Cato v. United States, 70 F.3d 1103, 1106 (9th Cir. 1995)
- School District No. 1J, Multnomah County, Oregon v. ACandS, Inc., 5 F.3d 1255, 1263 (9th Cir. 1993)
- United Student Aid Funds, Inc. v. Espinosa, 559 U.S. 260, 130 S. Ct. 1367, 176 L. Ed. 2d 158 (2010)

- Exxon Mobil Corporation v. Saudi Basic Industries
- Hirsh v. Justices of Supreme Court of State of California, 67 F.3d 708, 712 (9th Cir. 1995)
- Younger v. Harris, 401 U.S. 37, 40-41, 51-52 (1971)
- Stump v. Sparkman, 435 U.S. 349, 356-357 (1978)
- Mireles v. Waco, 502 U.S. 9, 9-12 (1991)
- U.S. v. Ritchie, 342 F.3d 903, 908 (9th Cir. 2003)
- Reyn's Pasta Bella, LLC v. Visa USA, Inc., 442 F.3d 741, 746 n.6 (9th Cir. 2006)
- In re Reyes, 2019 WL 1759749, at *5 (B.A.P. 9th Cir. Apr. 19, 2019), aff'd, 812 F. App'x 464 (9th Cir. 2020)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/federal/united-states-district-court-for-the-northern-district-of-ca/2025/oliver-v-napa-county-district-attorney-employee-s-et-al-57ttt2uo>