

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF CONNECTICUT

Jake Ratches v. Tony Guerrero, et al.

Ratches · No. 3:24-CV-1319 (SVN) · Decided March 2, 2026

SUMMARY

The United States District Court for the District of Connecticut rules on defendants’ motion to dismiss and Jake Ratches’s renewed motion for a temporary restraining order and preliminary injunction concerning the suspension and restoration of his Connecticut driver’s license. The court dismisses the substantive due process and Excessive Fines Clause claims, denies the request for injunctive relief, and allows the procedural due process claim challenging notice and the opportunity for an administrative hearing to proceed. The court declines at this stage to dismiss that claim on statute-of-limitations or failure-to-exhaust grounds.

CASE DETAILS

COURT	United States District Court for the District of Connecticut
WRITING FOR THE COURT	Sarala V. Nagala
JURISDICTION	United States District Court for the District of Connecticut
DECIDED	March 2, 2026
DOCKET	3:24-CV-1319 (SVN)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff brought a 42 U.S.C. § 1983 action challenging the suspension and restoration requirements for his Connecticut driver's license. Defendants moved to dismiss the amended complaint under Federal Rule of Civil Procedure 12(b)(6), and plaintiff moved for a temporary restraining order and preliminary injunction seeking immediate restoration of his license.
STANDARD OF REVIEW	On the motion to dismiss, the court applied Rule 12(b)(6), accepting well-pleaded factual allegations as true, drawing reasonable inferences for plaintiff, and determining whether the amended complaint plausibly stated a claim. For preliminary injunctive relief, plaintiff had to show likelihood of success or sufficiently serious questions, irreparable harm, a favorable balance of hardships, and consistency with the public interest; because the requested relief was mandatory, the likelihood-of-success and irreparable-harm showings were more demanding.

TOPICS

procedural due process

section 1983

motions to dismiss

injunctions

excessive fines

PRACTICE AREAS

constitutional law

civil rights

administrative law

civil procedure

prisoner civil rights

QUESTIONS PRESENTED

1. Whether the continued enforcement of the driver's-license suspension, ignition-interlock requirement, and restoration fee after dismissal of plaintiff's DUI charge plausibly constituted a Fourteenth Amendment substantive due process violation.
2. Whether Connecticut's restoration fee and ignition-interlock requirement constituted punishment subject to the Eighth Amendment Excessive Fines Clause.
3. Whether plaintiff plausibly stated a Fourteenth Amendment procedural due process claim by alleging that he did not receive notice of the suspension or an opportunity for an administrative hearing.
4. Whether the procedural due process claim was barred at the pleading stage by the statute of limitations.
5. Whether the procedural due process claim was barred because plaintiff did not exhaust Connecticut administrative or judicial remedies.
6. Whether plaintiff was entitled to a temporary restraining order or preliminary injunction restoring his driver's license.

HOLDINGS

1. The amended complaint did not plausibly allege that enforcing Connecticut's license-restoration requirements after dismissal of the DUI charge was arbitrary, conscience-shocking, or oppressive in the constitutional sense. Counts One and Three were dismissed.
2. The \$175 restoration fee and ignition-interlock requirement were remedial rather than punitive and therefore did not fall within the protection of the Excessive Fines Clause. Count Two was dismissed.
3. Plaintiff plausibly stated a procedural due process claim by alleging that he did not receive notice of the license suspension and therefore could not obtain an administrative hearing. The claim survived dismissal.
4. The procedural due process claim could not be dismissed on statute-of-limitations grounds at the pleading stage because the date plaintiff learned of the alleged deprivation was outside the four corners of the complaint.
5. Plaintiff was not required to exhaust Connecticut administrative or judicial remedies before bringing his § 1983 procedural due process claim.
6. Plaintiff was not entitled to a TRO or preliminary injunction restoring his driver's license because he failed to show irreparable harm, a likelihood of success on the procedural due process claim, or that the

public interest favored relief.

KEY QUOTATIONS

“A Fourteenth Amendment procedural due process claim has two elements: “(1) the existence of a property or liberty interest that was deprived and (2) deprivation of that interest without due process.””

“Thus, Plaintiff need not have exhausted his state administrative (or judicial) remedies prior to bringing his section 1983 challenges to his licensing suspension.”

“The Court therefore denies Plaintiff’s motion for a TRO and a preliminary injunction.”

FACTUAL BACKGROUND

Plaintiff was arrested and charged with DUI in Connecticut on November 25, 2018, when he was under twenty-one, and his driver's license was suspended. He alleged that he did not receive the statutory suspension notice or an opportunity for an administrative hearing, and that he was unable to install the required ignition interlock device while incarcerated. The DUI prosecution ended in March 2022 through a nolle prosequi, but plaintiff alleged that the DMV continued enforcing the suspension and restoration requirements. His license expired after the two-year renewal period, and he sought restoration without the interlock requirement and fee.

PROCEDURAL HISTORY

Plaintiff filed the action on August 15, 2024, while incarcerated, and later filed an amended complaint after the court permitted claims under the Fourteenth Amendment Due Process Clause, the Fifth Amendment Double Jeopardy Clause, and potentially the Eighth Amendment Excessive Fines Clause. The court previously dismissed the Double Jeopardy claim and denied earlier requests for injunctive relief. In this ruling, the court granted defendants' motion to dismiss Counts One, Two, and Three, denied dismissal of Count Four, and denied plaintiff's renewed motion for a TRO and preliminary injunction.

DISPOSITION

other

CASES CITED

- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)
- Giraldo v. Kessler, 694 F.3d 161, 164 (2d Cir. 2012)
- Roberts v. Babkiewicz, 582 F.3d 418, 420 (2d Cir. 2009)
- Southerland v. City of New York, 680 F.3d 127, 151 (2d Cir. 2012)
- Ferran v. Town of Nassau, 471 F.3d 363, 369-70 (2d Cir. 2006)
- Tenenbaum v. Williams, 193 F.3d 581, 600 (2d Cir. 1999)
- Huang Do v. Commissioner of Motor Vehicles, 330 Conn. 651, 679 (2019)
- State v. Hickam, 235 Conn. 614, 624-27 (1995)
- Hickey v. Commissioner of Motor Vehicles, 170 Conn. 136, 139 (1976)

- Tele Tech of Connecticut Corp. v. Department of Public Utility Control, 270 Conn. 778 (2004)
- Short v. Ward, No. CV07-4022631-S, 2008 WL 1734704, at *4 (Conn. Super. Ct. Mar. 25, 2008)
- Cisló v. City of Shelton, 240 Conn. 590, 599 n.9 (1997)
- Grasso v. Newbury, No. 361369, 1990 WL 271096, at *1 (Conn. Super. Ct. Apr. 17, 1990)
- In re Casey L., No. W10-CP-15017067-A, 2016 WL 5173638, at *2 n.2 (Conn. Super. Ct. Aug. 11, 2016)
- United States v. Viloski, 814 F.3d 104, 108-10 (2d Cir. 2016)
- Reese v. Triborough Bridge & Tunnel Authority, 91 F.4th 582, 589 n.2 (2d Cir. 2024)
- Beatty v. Gilman, 718 F. Supp. 3d 166, 185 (D. Conn. 2024)
- United States v. An Antique Platter of Gold, 184 F.3d 131, 139-40 (2d Cir. 1999)
- Macci v. Commissioner of Motor Vehicles, No. HHB-CV-216065931-S, 2022 WL 294329, at *3 (Conn. Super. Ct. Jan. 14, 2022)
- Bryant v. New York State Education Department, 692 F.3d 202, 218 (2d Cir. 2012)
- Zinerman v. Burch, 494 U.S. 113, 126 (1990)
- United States v. James Daniel Good Real Property, 510 U.S. 43, 48 (1993)
- Mullane v. Central Hanover Bank & Trust Co., 339 U.S. 306, 314 (1950)
- Lounsbury v. Jeffries, 25 F.3d 131, 134 (2d Cir. 1994)
- Ellul v. Congregation of Christian Brothers, 774 F.3d 791, 798 n.12 (2d Cir. 2014)
- Roeder v. J.P. Morgan Chase & Co., 523 F. Supp. 3d 601, 611 (S.D.N.Y. 2021)
- Twersky v. Yeshiva University, 993 F. Supp. 2d 429, 436 (S.D.N.Y. 2014)
- Roeder v. J.P. Morgan Chase & Co., No. 21-552, 2022 WL 211702 (2d Cir. Jan. 25, 2022)
- Barnes v. City of New York, 68 F.4th 123, 127 (2d Cir. 2023)
- Smith v. Campbell, 782 F.3d 93, 100 (2d Cir. 2015)
- Wallace v. Kato, 549 U.S. 384, 388 (2007)
- Mallet v. New York State Department of Corrections & Community Supervision, 126 F.4th 125, 131 (2d Cir. 2025)
- McDonough v. Smith, 588 U.S. 109, 115 (2019)
- Singleton v. City of New York, 632 F.2d 185, 191 (2d Cir. 1980)
- Levine v. Town of Sterling, 300 Conn. 521, 528 (2011)
- Roach v. Morse, 440 F.3d 53, 56 (2d Cir. 2006)
- Patsy v. Board of Regents, 457 U.S. 496, 516 (1982)
- Doe v. Pfrommer, 148 F.3d 73, 78 (2d Cir. 1998)
- Moore v. Consolidated Edison Co. of New York, Inc., 409 F.3d 506, 510 (2d Cir. 2005)
- Mazurek v. Armstrong, 520 U.S. 968, 972 (1997)
- Winter v. Natural Resources Defense Council, Inc., 555 U.S. 7, 24 (2008)
- Stoneway Capital Corp. v. Siemens Energy Inc., No. 19 Civ. 11355 (GBD) (SLC), 2020 WL 764457, at *1 (S.D.N.Y. Feb. 14, 2020)
- Benihana, Inc. v. Benihana of Tokyo, LLC, 784 F.3d 887, 895 (2d Cir. 2015)

- Daileader v. Certain Underwriters at Lloyds London Syndicate 1861, 96 F.4th 351, 356 (2d Cir. 2024)
- New York ex rel. Schneiderman v. Actavis PLC, 787 F.3d 638, 650 (2d Cir. 2015)
- Drywall Tapers & Pointers of Greater New York, Local 1974 of I.B.P.A.T., AFL-CIO v. Local 530 of Operative Plasterers & Cement Masons International Ass'n, 954 F.2d 69, 76-77 (2d Cir. 1992)
- Maryland Casualty Co. v. Realty Advisory Board on Labor Relations, 107 F.3d 979, 984 (2d Cir. 1997)
- Lopez v. McEwan, No. 3:08-CV-678 (JCH), 2009 WL 179815, at *1 (D. Conn. Jan. 23, 2009)
- State Farm Mutual Automobile Insurance Co. v. Tri-Borough NY Medical Practice P.C., 120 F.4th 59, 80 (2d Cir. 2024)
- Rodriguez ex rel. Rodriguez v. DeBuono, 175 F.3d 227, 234 (2d Cir. 1999)
- Jayaraj v. Scappini, 66 F.3d 36, 39 (2d Cir. 1995)
- Sampson v. Murray, 415 U.S. 61, 90 (1974)
- Weight Watchers International, Inc. v. Luigino's, Inc., 423 F.3d 137, 144 (2d Cir. 2005)
- Citibank, N.A. v. Citytrust, 756 F.2d 273, 276-77 (2d Cir. 1985)
- Goldstein v. Hochul, No. 22-CV-8300 (VSB), 2022 WL 20305832, at *2 (S.D.N.Y. Oct. 3, 2022)
- Mintz v. Chiumento, 724 F. Supp. 3d 40, 66 (N.D.N.Y. 2024)
- New York State Rifle & Pistol Ass'n, Inc. v. Cuomo, 804 F.3d 242, 261 (2d Cir. 2015)
- Fishbein v. Kozlowski, 252 Conn. 38, 48-49 (1999)
- Fowlkes v. Ironworkers Local 40, 790 F.3d 378, 387 (2d Cir. 2015)
- Triestman v. Federal Bureau of Prisons, 470 F.3d 471, 477 (2d Cir. 2006)