

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF KANSAS

Donna Huffman v. State of Kansas, et al.

Huffman · No. 2:25-cv-02088-HLT-TJJ · Decided March 31, 2026

SUMMARY

The United States District Court for the District of Kansas dismisses pro se plaintiff Donna Huffman’s action challenging Kansas attorney-discipline proceedings and related conduct. The court finds jurisdictional defects based on Eleventh Amendment immunity and the Rooker-Feldman doctrine, insufficient service on individual defendants, and pleading deficiencies under Rule 8 and Rule 12(b)(6). Federal claims are dismissed on various grounds, while state-law claims are dismissed without prejudice after the court declines supplemental jurisdiction.

CASE DETAILS

COURT	United States District Court for the District of Kansas
WRITING FOR THE COURT	Holly L. Teeter
JURISDICTION	United States District Court for the District of Kansas
DECIDED	March 31, 2026
DOCKET	2:25-cv-02088-HLT-TJJ
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff brought pro se federal civil-rights, constitutional, ADA, and state-law claims concerning Kansas attorney-discipline and related state proceedings. Defendants moved to dismiss under Federal Rules of Civil Procedure 12(b)(1), 12(b)(5), and 12(b)(6).
STANDARD OF REVIEW	On a facial Rule 12(b)(1) challenge, the court accepts the complaint's jurisdictional allegations as true and places the burden on the plaintiff to establish subject-matter jurisdiction. A Rule 12(b)(6) complaint must contain sufficient factual matter to state a plausible claim and must comply with Rule 8's short-and-plain-statement requirement. Once qualified immunity is asserted, the plaintiff bears the burden to show both a constitutional or statutory violation and violation of clearly established law. The plaintiff bears the burden of establishing proper service when service is challenged.
PRECEDENTIAL VALUE	Unknown; memorandum and order from a federal district court, with the source metadata identifying precedential status as unknown.

PARTIES

Donna Huffman v. State of Kansas, Kansas Supreme Court, Kansas Office of Judicial Administration, Kansas Office of the Disciplinary Administrator, Kansas Board for Discipline of Attorneys, Kansas Department for Children and Families, Kansas Office of Administrative Hearings, Gayle Larkin, Stanton Hazlett, Matthew Boddington, Robert Hecht, Justice Marla Luckert, Unknown and Related Officials and Employees for the State of Kansas

TOPICS

motions to dismiss subject matter jurisdiction service of process civil procedure sovereign immunity

PRACTICE AREAS

civil rights constitutional law civil procedure sovereign immunity administrative law
disability discrimination

QUESTIONS PRESENTED

1. Whether the Eleventh Amendment barred Huffman's damages claims against Kansas, its agencies, and officials sued in their official capacities.
2. Whether the Rooker-Feldman doctrine deprived the district court of jurisdiction over claims challenging or inextricably intertwined with Kansas attorney-discipline proceedings and the resulting state-court judgment.
3. Whether claims against individual defendants in their personal capacities should be dismissed for insufficient service of process.
4. Whether the federal claims should be dismissed under Rule 8 because the amended complaint was lengthy, disorganized, conclusory, and failed to provide a short and plain statement identifying the claims and responsible defendants.
5. Whether individual defendants were entitled to qualified immunity on the constitutional claims.
6. Whether the court should exercise supplemental jurisdiction over the state-law claims after dismissal of the federal claims.
7. Whether Huffman should receive another opportunity to amend.

HOLDINGS

1. The Eleventh Amendment bars Huffman's claims for damages against the State of Kansas, Kansas agencies, and state officials sued in their official capacities because Kansas did not consent to suit and 42 U.S.C. § 1983 does not abrogate the state's sovereign immunity.
2. The federal claims are barred by the Rooker-Feldman doctrine because they are inextricably intertwined with the Kansas state-court decisions concerning Huffman's attorney discipline and seek relief that would effectively require federal review or alteration of those decisions and procedures.

3. The claims against Hazlett, Boddington, Hecht, and Larkin in their individual capacities must be dismissed without prejudice because Huffman did not establish proper service under Rule 4 and applicable Kansas law.
4. The amended complaint fails Rule 8 because it is lengthy, disorganized, unnecessarily complicated, and does not provide a short, plain, simple, concise, and direct statement identifying the claims and the conduct attributable to each defendant.
5. Hazlett, Boddington, Hecht, and Larkin are entitled to qualified immunity on the constitutional claims asserted against them in their individual capacities.
6. Huffman's purported ADA claim fails to state a claim because she did not plead what benefits she was denied because of her disability, what accommodation she sought, or that the requested accommodation was reasonable.
7. The court properly declined supplemental jurisdiction over the state-law claims after dismissing the federal claims and dismissed those state-law claims without prejudice.

KEY QUOTATIONS

“Rooker-Feldman bars a federal claim, whether or not raised in state court, that asserts injury based on a state judgment and seeks review and reversal of that judgment; such a claim is ‘inextricably intertwined’ with the state judgment.”

“There is simply no way to cleanly excise Plaintiff’s requests for relief from the decision to suspend her law license.”

“It is even more important to be specific about actions, actors, and dates when a defendant raises qualified immunity.”

FACTUAL BACKGROUND

Huffman, a former Kansas attorney now on disabled status, challenged conduct allegedly arising from child-abuse reports, her character-and-fitness review, prior litigation and sanctions, and Kansas attorney-discipline proceedings culminating in a 2022 suspension of her law license. Her amended complaint asserted federal constitutional and ADA theories, state statutory and tort claims, and requests for damages and prospective injunctive relief against Kansas entities and officials. The complaint covered more than twenty years, used collective references to defendants, and did not clearly identify the factual basis of each claim.

PROCEDURAL HISTORY

Huffman filed an amended complaint challenging events spanning more than twenty years, including her Kansas bar admission and suspension proceedings. Defendants moved to dismiss. The district court granted the motion, dismissing the federal claims without prejudice on subject-matter-jurisdiction and service grounds, dismissing any surviving federal claims with prejudice for failure to comply with Rule 8 and failure to overcome qualified immunity, declining supplemental jurisdiction over the state-law claims, and closing the case.

DISPOSITION

dismissed

CASES CITED

- Hall v. Bellmon, 935 F.2d 1106, 1110 (10th Cir. 1991)
- Landrith v. Kan. Att'y Gen., 2012 WL 5398004, at *2 (D. Kan. 2012)
- In the Matter of Donna L. Huffman, 509 P.3d 1253 (Kan. 2022)
- Holt v. United States, 46 F.3d 1000, 1002 (10th Cir. 1995)
- Cent. Green Co. v. United States, 531 U.S. 425 (2001)
- Loudermill v. Hoskins, 2024 WL 4533528, at *3 (D. Kan. 2024)
- Marcus v. Kan. Dep't of Revenue, 170 F.3d 1305, 1309 (10th Cir. 1999)
- Kentucky v. Graham, 473 U.S. 159, 165-66, 169 (1985)
- Williams v. Utah Dep't of Corr., 928 F.3d 1209, 1212 (10th Cir. 2019)
- Allen v. Knowlton, 2023 WL 3496237, at *2 (D. Kan. 2023)
- Matter of Morton, 538 P.3d 1073, 1086 (Kan. 2023)
- Rooker v. Fidelity Trust Co., 263 U.S. 413 (1923)
- D.C. Court of Appeals v. Feldman, 460 U.S. 462 (1983)
- Knox v. Bland, 632 F.3d 1290, 1292 (10th Cir. 2011)
- Merrill Lynch Bus. Fin. Servs., Inc. v. Nudell, 363 F.3d 1072, 1075 (10th Cir. 2004)
- Bolden v. City of Topeka, Kan., 441 F.3d 1129, 1140-41, 1145 (10th Cir. 2006)
- Ex parte Young, 209 U.S. 123 (1908)
- West v. (LNU), 2025 WL 2106806, at *10 (D. Kan. 2025)
- Elephant Butte Irr. Dist. of New Mexico v. Dep't of Interior, 160 F.3d 602, 609 (10th Cir. 1998)
- Idaho v. Coeur d'Alene Tribe of Idaho, 521 U.S. 261, 281 (1997)
- Kline v. Biles, 861 F.3d 1177, 1180 (10th Cir. 2017)
- Ziahkovich v. Members of Colo. Supreme Ct., 2021 WL 4047000, at *3 (10th Cir. 2021)
- Mann v. Castiel, 681 F.3d 368, 372 (D.C. Cir. 2012)
- Wanjiku v. Johnson Cnty., 173 F. Supp. 3d 1217, 1229 (D. Kan. 2016)
- Okla. Radio Assocs. v. F.D.I.C., 969 F.2d 940, 943 (10th Cir. 1992)
- Rivera v. Riley Cnty. Law Bd., 2011 WL 4686554, at *2 (D. Kan. 2011)
- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)
- Schupper v. Edie, 193 F. App'x 744, 745-46 (10th Cir. 2006)
- D.M. by & through Morgan v. Wesley Med. Ctr. LLC, 2018 WL 4222382, at *3 (D. Kan. 2018)
- Mann v. Boatright, 477 F.3d 1140, 1147-48 (10th Cir. 2007)
- McHenry v. Renne, 84 F.3d 1172, 1179 (9th Cir. 1996)
- U.S. ex rel. Garst v. Lockheed-Martin Corp., 328 F.3d 374, 378 (7th Cir. 2003)
- Baker v. City of Loveland, 686 F. App'x 619, 620 (10th Cir. 2017)

- Pearson v. Callahan, 555 U.S. 223, 231 (2009)
- Mullenix v. Luna, 577 U.S. 7, 12 (2015)
- Ashcroft v. al-Kidd, 563 U.S. 731, 735 (2011)
- Estate of Taylor v. Salt Lake City, 16 F.4th 744, 757 (10th Cir. 2021)
- Pahls v. Thomas, 718 F.3d 1210, 1227 (10th Cir. 2013)
- City of Chicago v. Int'l Coll. of Surgeons, 522 U.S. 156, 164-65 (1997)
- Wittner v. Banner Health, 720 F.3d 770, 781 (10th Cir. 2013)
- Exum v. U.S. Olympic Comm., 389 F.3d 1130, 1138 (10th Cir. 2004)
- Heffington v. Derby United Sch. Dist. 260, 2011 WL 5149257, at *3 (D. Kan. 2011)
- Villalpando ex rel. Villalpando v. Denver Health & Hosp. Auth., 65 F. App'x 683, 688 (10th Cir. 2003)
- Nielander v. Bd. of Cnty. Comm'rs, 582 F.3d 1155, 1172 (10th Cir. 2009)
- Brooks v. Mentor Worldwide LLC, 985 F.3d 1272, 1282-83 (10th Cir. 2021)