

UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

Sullivan v. Linebaugh

362 F. App'x 248 (3d Cir. 2010) · Decided January 28, 2010

SUMMARY

The Third Circuit affirmed dismissal of Dennis Sullivan’s federal claims against state judges, prosecutors, and police officers arising from Pennsylvania traffic proceedings. The court held that the claims were barred by the Rooker-Feldman doctrine because they sought to undermine state-court jurisdictional determinations, and alternatively noted that relitigation was barred by res judicata.

CASE DETAILS

COURT	United States Court of Appeals for the Third Circuit
WRITING FOR THE COURT	Ambro; Barry; Roth
JURISDICTION	Federal
DECIDED	January 28, 2010
DISPOSITION	affirmed
PROCEDURAL POSTURE	Sullivan appealed the Middle District of Pennsylvania's order granting motions to dismiss filed by two assistant district attorneys and two police officers and dismissing claims against two state court judges.
STANDARD OF REVIEW	Plenary review of the District Court's decision, including application of the Rooker-Feldman doctrine as a question of federal subject-matter jurisdiction.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Dennis S. Sullivan v. Richard Linebaugh, James Miner, Lori Yost, Michelle L. Sommer, Nathanael D. Behrendt, Corey L. Merwede

TOPICS

subject matter jurisdiction

res judicata

appellate jurisdiction

appellate procedure

civil procedure

PRACTICE AREAS

civil procedure

civil rights

appellate jurisdiction

QUESTIONS PRESENTED

1. Whether the federal claims were barred by the Rooker-Feldman doctrine because Sullivan sought relief requiring the District Court to reject Pennsylvania state-court jurisdictional determinations.
2. Whether, to the extent Sullivan was attempting to relitigate issues previously decided by Pennsylvania courts rather than appeal the state judgments, his claims were barred by res judicata or collateral estoppel.
3. Whether the District Court properly dismissed the action and claims against the state judges.

HOLDINGS

1. Sullivan's claims were barred by the Rooker-Feldman doctrine because granting the requested relief would require the federal District Court to determine that the Pennsylvania state courts' jurisdictional determinations were improper.
2. To the extent Sullivan was attempting to relitigate issues previously determined by Pennsylvania courts, review was barred by res judicata.

KEY QUOTATIONS

“The Rooker-Feldman doctrine divests federal courts of jurisdiction “if the relief requested effectively would reverse a state court decision or void its ruling.”” (250)

“It applies only where “the losing party in state court filed suit in federal court after the state proceedings ended, complaining of an injury caused by the state-court judgment and seeking review and rejection of that judgment.”” (250)

FACTUAL BACKGROUND

Penn Township police officers stopped Sullivan on two occasions and charged him with traffic offenses, including driving while under suspension, driving an unregistered vehicle, operating a vehicle without a valid inspection, and driving without proof of financial responsibility. After Sullivan was convicted in state court, he repeatedly challenged the state courts' authority to adjudicate the traffic proceedings. He later sued the state judges, assistant district attorneys, and police officers for alleged misconduct and obstruction of justice, seeking relief based on the asserted lack of subject-matter jurisdiction.

PROCEDURAL HISTORY

Sullivan was convicted of traffic offenses in Pennsylvania state court after challenging the state courts' subject-matter jurisdiction. He then filed a state civil action for damages against the judges, prosecutors, and police officers; the Court of Common Pleas dismissed the complaint, the Commonwealth Court affirmed on immunity grounds, and the Pennsylvania Supreme Court denied review. Sullivan subsequently filed a federal action based on the same jurisdictional challenge. The federal District Court adopted a magistrate judge's recommendation, dismissed the claims under the Rooker-Feldman doctrine and *Heck v. Humphrey*, and dismissed the judges; the Third Circuit affirmed.

DISPOSITION

affirmed

CASES CITED

- Heck v. Humphrey, 512 U.S. 477, 114 S. Ct. 2364, 129 L. Ed. 2d 383 (1994)
- Taliaferro v. Darby Township Zoning Board, 458 F.3d 181, 192 (3d Cir. 2006)
- Exxon Mobil Corp. v. Saudi Basic Industries Corp., 544 U.S. 280, 284, 291 (2005)
- Nationwide Mutual Fire Insurance Co. v. George V. Hamilton, Inc., 571 F.3d 299, 310 (3d Cir. 2009)
- Phillips v. County of Allegheny, 515 F.3d 224, 230 (3d Cir. 2008)
- Whiteford v. Reed, 155 F.3d 671, 672 (3d Cir. 1998)