

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OHIO

Ealom v. Parker, et al.

Ealom · No. 1:26-cv-78 · Decided March 16, 2026

SUMMARY

The United States District Court for the Northern District of Ohio considers Emanuel Ealom’s civil rights claims against a probation officer and Cuyahoga County arising from an alleged probation violation and arrest warrant. The court grants in forma pauperis status, denies injunctive relief and a temporary restraining order, and applies Younger abstention because related state probation proceedings remain pending. The court stays and administratively closes the federal case pending completion of the state proceedings and any appeals.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio
WRITING FOR THE COURT	J. Philip Calabrese
JURISDICTION	United States District Court for the Northern District of Ohio
DECIDED	March 16, 2026
DOCKET	1:26-cv-78
DISPOSITION	other
PROCEDURAL POSTURE	A pro se plaintiff brought a civil-rights action under federal law challenging probation-violation proceedings and an arrest warrant, seeking injunctive relief and monetary damages. The district court granted leave to proceed in forma pauperis, denied injunctive relief and a temporary restraining order under Younger abstention, and stayed the damages claims pending completion of the state proceedings and appeals.
STANDARD OF REVIEW	For in forma pauperis screening, the court determines whether the action fails to state a claim or lacks an arguable basis in law or fact. Pro se pleadings are liberally construed, but the complaint must satisfy the plausibility pleading standard. Younger abstention is assessed under whether state proceedings are ongoing, implicate important state interests, and provide an adequate opportunity to raise federal questions.

PRECEDENTIAL VALUE

unpublished district court opinion

PARTIES

Emanuel Ealom v. Teona Parker, Cuyahoga County, Ohio

TOPICS

injunctions

civil procedure

due process

civil rights

damages

PRACTICE AREAS

Civil rights

Federal civil procedure

Criminal procedure

Constitutional law

Federalism

QUESTIONS PRESENTED

1. Whether the court should grant the pro se plaintiff's application to proceed in forma pauperis.
2. Whether Younger abstention required the federal court to deny injunctive relief that would interfere with ongoing state probation-violation proceedings.
3. Whether the plaintiff's claims for monetary damages should be stayed pending completion of the related state proceedings and any appeals.

HOLDINGS

1. The court granted the plaintiff's application to proceed in forma pauperis.
2. Younger abstention required the federal court to refrain from interfering with the ongoing state probation-violation proceedings and to deny the plaintiff's request for injunctive relief and temporary restraining order.
3. The court stayed the plaintiff's claims for monetary damages until the state probation-violation proceedings, including all appeals, concluded.

KEY QUOTATIONS

"[I]t is well established that federal courts are courts of limited jurisdiction, possessing only that power authorized by the Constitution and statute." (Analysis)

"The Court will not interfere in a criminal case pending in State court by deciding issues that are central to that case." (Analysis)

FACTUAL BACKGROUND

Ealom pleaded guilty in state court to aggravated assault, domestic violence, and theft and received two years of probation. He alleged that his probation officer coerced him into signing a second, more restrictive supervision agreement and fabricated or improperly pursued probation violations. After a probation-violation charge was filed, he failed to appear at a probable-cause hearing, leading the state court to issue an arrest warrant that appeared to remain active. He filed the federal action seeking damages, an order voiding the warrant, and expungement of his conviction while the state probation-violation matter remained pending.

PROCEDURAL HISTORY

Ealom was convicted in Cuyahoga County Court of Common Pleas and placed on probation. After an alleged probation violation, he failed to appear at a probable-cause hearing, and the state court issued an arrest warrant. He then filed this federal action against his probation officer and Cuyahoga County. The district court granted in forma pauperis status, denied requests for injunctive relief, stayed the monetary claims, and administratively closed the case subject to reopening after the state probation proceedings and any appeals conclude.

DISPOSITION

other

CASES CITED

- Boag v. MacDougall, 454 U.S. 364, 365 (1982) (per curiam)
- Haines v. Kerner, 404 U.S. 519, 520 (1972)
- Neitzke v. Williams, 490 U.S. 319, 327-28 (1989)
- Lawler v. Marshall, 898 F.2d 1196 (6th Cir. 1990)
- Sistrunk v. City of Strongsville, 99 F.3d 194, 197 (6th Cir. 1996)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555, 564 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 677-78 (2009)
- Papasan v. Allain, 478 U.S. 265, 286 (1986)
- Bibbo v. Dean Witter Reynolds, Inc., 151 F.3d 559, 561 (6th Cir. 1998)
- Lathan v. Goulding, No. 3:16-CV-01519, 2018 WL 3222594, at *2 (N.D. Ohio July 2, 2018)
- Kokkonen v. Guardian Life Insurance Co. of America, 511 U.S. 375, 377 (1994)
- Hudson v. Coleman, 347 F.3d 138, 141 (6th Cir. 2003)
- Younger v. Harris, 401 U.S. 37, 41, 44-45 (1971)
- Watts v. Burkhardt, 854 F.2d 839, 844-48 (6th Cir. 1988)
- Pennzoil Co. v. Texaco, Inc., 481 U.S. 1, 14-15 (1987)
- Middlesex County Ethics Committee v. Garden State Bar Association, 457 U.S. 423, 432 (1982)
- Moore v. Sims, 442 U.S. 415, 430 (1979)

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