

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK

Stora v. New York City Board of Elections and Rusat Ramgopal

Stora · No. 25-CV-5004 (NRM) (RML) · Decided January 7, 2026

SUMMARY

The Eastern District of New York granted the New York City Board of Elections’ motion for an anti-filing injunction against pro se plaintiff Skiboky Stora. The court found that Stora had a substantial history of vexatious and unsuccessful litigation, had caused needless expense and burdens, and was unlikely to be deterred by lesser sanctions. The injunction bars Stora from filing further federal actions against the Board or its personnel in the Eastern or Southern Districts of New York without leave of the applicable Chief Judge.

CASE DETAILS

COURT	United States District Court for the Eastern District of New York
WRITING FOR THE COURT	Nina R. Morrison
JURISDICTION	United States District Court for the Eastern District of New York
DECIDED	January 7, 2026
DOCKET	25-CV-5004 (NRM) (RML)
DISPOSITION	other
PROCEDURAL POSTURE	After dismissing Plaintiff's underlying ballot-access action, the district court considered the New York City Board of Elections' request for an anti-filing injunction barring Plaintiff from filing future federal actions against the Board or its personnel in the Eastern or Southern Districts of New York without leave of the applicable chief judge.
STANDARD OF REVIEW	The court applied the Second Circuit's standards governing anti-filing injunctions, requiring consideration of five substantive factors, notice and an opportunity to be heard, and a narrowly tailored injunction.
PRECEDENTIAL VALUE	unpublished district court memorandum and order

TOPICS

- sanctions
- injunctions
- civil procedure
- election law

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the district court should impose an anti-filing injunction based on Plaintiff's history of vexatious and repetitive litigation.
2. Whether Plaintiff received adequate notice and an opportunity to be heard before the anti-filing injunction was imposed.
3. Whether the proposed injunction was sufficiently narrow and tailored to avoid being overbroad.

HOLDINGS

1. An anti-filing injunction was warranted because Plaintiff's substantial history of vexatious and baseless litigation, lack of an objective good-faith expectation of prevailing, needless expense and burden imposed on the Board and courts, and the inadequacy of lesser sanctions outweighed the countervailing consideration of his pro se status.
2. A district court may not impose an anti-filing injunction sua sponte without notice and an opportunity to be heard, and those requirements were satisfied because the Board requested the injunction in advance, briefed it, and the court gave Plaintiff additional time to respond.
3. The anti-filing injunction was appropriately limited because it barred only new federal actions against the New York City Board of Elections or its personnel in the Eastern or Southern Districts of New York and permitted potentially meritorious filings with leave of the applicable chief judge.

KEY QUOTATIONS

"The filing of repetitive and frivolous suits constitutes the type of abuse for which an injunction forbidding further litigation may be an appropriate sanction." (Discussion, Part I)

"The unequivocal rule in the Second Circuit is that a district court "may not impose a filing injunction on a litigant sua sponte without providing the litigant with notice and an opportunity to be heard."" (Discussion, Part I)

FACTUAL BACKGROUND

Plaintiff had filed at least seven prior actions in the Eastern District of New York and at least seven additional actions in various courts involving the New York State or New York City Boards of Elections. The actions were unsuccessful, and several were dismissed for failure to prosecute or failure to comply with court orders. In the present action, Plaintiff again sought emergency ballot-access relief shortly before a general election, and the district court determined that the action was barred by the Rooker-Feldman doctrine and claim preclusion.

PROCEDURAL HISTORY

Plaintiff filed an action seeking an order requiring the New York City Board of Elections to place him on the ballot as a candidate for Mayor of New York City and also sought reversal of a New York state appellate decision. The district court dismissed the action under the Rooker-Feldman doctrine and claim preclusion, and

reserved decision on the Board's anti-filing-injunction request to give Plaintiff an additional opportunity to respond. After multiple extensions and an untimely submission, the court granted the anti-filing injunction.

DISPOSITION

other

CASES CITED

- *Eliahu v. Jewish Agency for Israel*, 919 F.3d 709, 713–16 (2d Cir. 2019)
- *Safir v. U.S. Lines, Inc.*, 792 F.2d 19, 24 (2d Cir. 1986)
- *Hong Mai Sa v. Doe*, 406 F.3d 155, 158 (2d Cir. 2005)
- *Shafii v. British Airways, PLC*, 83 F.3d 566, 571 (2d Cir. 1996)
- *Iwachiw v. N.Y. Department of Motor Vehicles*, 396 F.3d 525, 528–29 (2d Cir. 2005)
- *Moates v. Barkley*, 147 F.3d 207, 208 (2d Cir. 1998)
- *Matter of Hartford Textile Corp.*, 613 F.2d 388, 390 (2d Cir. 1979)
- *Vassel v. Firststorm Properties 2 LLC*, 750 F. App'x 50, 52–53 (2d Cir. 2018)
- *In re Martin-Trigona*, 737 F.2d 1254, 1263 (2d Cir. 1984)
- *Lipin v. Hunt*, 573 F. Supp. 2d 836, 839, 845–46 (S.D.N.Y. 2008)
- *El Bey v. City of New York*, No. 13-CV-8927 (AJN), 2015 WL 3526987, at *2 (S.D.N.Y. June 3, 2015)
- *Gu v. Chen*, No. 24-CV-4756 (EK) (LB), 2025 WL 974270, at *1, *3 (E.D.N.Y. Apr. 1, 2025)
- *Int'l Star Class Yacht Racing Ass'n v. Tommy Hilfiger U.S.A., Inc.*, 146 F.3d 66, 70 (2d Cir. 1998)
- *Woodhouse v. Meta Platforms Inc.*, 704 F. Supp. 3d 502, 505, 520–21 (S.D.N.Y. 2023)
- *Stora v. N.Y. Bd. of Elections*, 208 A.D.3d 1213, 1213 (N.Y. App. Div. 2d Dep't 2022)
- *Stora v. N.Y. Bd. of Elections*, 195 N.E.3d 532 (N.Y. 2022)
- *Stora v. N.Y.C. Bd. of Elections*, 219 A.D.3d 1178 (N.Y. App. Div. 1st Dep't 2023)