

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
OHIO, WESTERN DIVISION

Brendon Taylor, et al. v. Jesse Lee Anthony Hooven, et al.

Taylor · No. 1:24-cv-204 · Decided December 1, 2025

SUMMARY

The United States District Court for the Southern District of Ohio denied Holly Hooven’s motion for a temporary restraining order and preliminary injunction seeking to stay enforcement of a state domestic-relations decision. The court held that Younger abstention applied because the state proceedings were ongoing, implicated important state interests, and provided an adequate opportunity to raise constitutional challenges.

CASE DETAILS

COURT	United States District Court for the Southern District of Ohio, Western Division
WRITING FOR THE COURT	Susan J. Dlott
JURISDICTION	United States District Court for the Southern District of Ohio, Western Division
DECIDED	December 1, 2025
DOCKET	1:24-cv-204
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff Holly Hooven moved under Federal Rule of Civil Procedure 65 for a temporary restraining order and preliminary injunction to prevent enforcement of a state domestic-relations court's contempt ruling. The federal district court denied the motion without further briefing.
STANDARD OF REVIEW	The court applied the Rule 65 standard governing temporary restraining orders and preliminary injunctions but denied relief on abstention grounds without deciding the substantive merits.
PRECEDENTIAL VALUE	Unknown

TOPICS

- injunctions
- civil procedure
- family law
- constitutional law
- federalism

PRACTICE AREAS

civil procedure

constitutional law

family law

remedies

federalism

QUESTIONS PRESENTED

1. Whether the Anti-Injunction Act barred the federal court from enjoining the state domestic-relations proceeding.
2. Whether the federal court should abstain under *Younger v. Harris* from issuing injunctive relief interfering with the pending state proceedings.
3. Whether Holly Hooven was entitled to a TRO or preliminary injunction based on her claim that the state contempt finding violated the First Amendment.

HOLDINGS

1. The Anti-Injunction Act did not prohibit the federal court from considering Holly Hooven's request for injunctive relief on the merits because 42 U.S.C. § 1983 falls within the Act's express-authorization exception.
2. The court abstained under *Younger v. Harris* from issuing a TRO or injunction that would interfere with the pending state domestic-relations litigation.

KEY QUOTATIONS

“Younger abstention requires a federal court to abstain from granting injunctive or declaratory relief that would interfere with pending state judicial proceedings.” (at 2)

“There is a general presumption that state courts are competent to protect federal rights.” (at 2)

FACTUAL BACKGROUND

Judge Betsy Sundermann issued an October 29, 2025 decision terminating a shared-custody agreement, designating Jesse Hooven as the residential parent and custodian, and finding Holly Hooven in contempt. The contempt finding was based in part on the disclosure of Jesse Hooven's residential address by Holly Hooven's counsel in a federal filing seeking issuance of a summons for service at that address. Holly Hooven appealed the state decision and sought a federal TRO and preliminary injunction against its enforcement.

PROCEDURAL HISTORY

A state domestic-relations court terminated the parties' shared-custody arrangement, designated Jesse Hooven as residential parent and custodian, and held Holly Hooven in contempt for violating an order barring disclosure of Jesse Hooven's residential address. Holly Hooven appealed the state decision and then sought federal injunctive relief, arguing that the contempt ruling violated her First Amendment rights. The federal court declined to reach the merits and abstained under *Younger* because the state proceedings were ongoing, implicated important state interests, and provided an adequate opportunity to raise constitutional claims.

DISPOSITION

other

CASES CITED

- *Martingale LLC v. City of Louisville*, 361 F.3d 297, 302 (6th Cir. 2004)
- *Mitchum v. Foster*, 407 U.S. 225, 242-43 (1972)
- *Fazel v. Morgantown Bank & Trust Co.*, No. CIV.A. 1:98-CV-142-R, 1998 WL 34077295, at *2 (W.D. Ky. Dec. 14, 1998)
- *Middlesex County Ethics Committee v. Garden State Bar Association*, 457 U.S. 423, 431 (1982)
- *Younger v. Harris*, 401 U.S. 37 (1971)
- *O'Neill v. Coughlan*, 511 F.3d 638, 643 (6th Cir. 2008)
- *Graves v. Mahoning County*, 534 F. App'x 399, 406 (6th Cir. 2013)
- *Mackenzie v. Green*, No. 99-5955, 2000 WL 922110, at *2 (6th Cir. June 27, 2000)
- *Kelm v. Hyatt*, 444 F.3d 415, 420 (6th Cir. 2005)

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