

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
PENNSYLVANIA

Michael Vincent Clinger v. Linda A. Cartisano, et al.

Clinger · No. 2:25-cv-05259 · Decided November 24, 2025

SUMMARY

The Eastern District of Pennsylvania dismissed Michael Vincent Clinger’s federal complaint against judges, court administrators, private attorneys, a corporation, and other defendants. The court held that the Rooker-Feldman doctrine deprived it of subject matter jurisdiction, that certain judicial and administrative defendants were immune from suit, and that the federal claims were inadequately pleaded. The court declined supplemental jurisdiction over the state-law claims and dismissed the action with prejudice.

CASE DETAILS

COURT	United States District Court for the Eastern District of Pennsylvania
WRITING FOR THE COURT	Kai N. Scott
JURISDICTION	United States District Court for the Eastern District of Pennsylvania
DECIDED	November 24, 2025
DOCKET	2:25-cv-05259
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff brought federal constitutional, civil-rights conspiracy, and Pennsylvania state-law claims concerning a state-court default judgment and related enforcement proceedings. Defendants filed six motions to dismiss under Federal Rules of Civil Procedure 12(b)(1), 12(b)(5), and 12(b)(6), and plaintiff moved to strike defendants' joint reply. The court denied the motion to strike, granted the motions to dismiss, and dismissed the complaint with prejudice.
STANDARD OF REVIEW	For a Rule 12(b)(1) motion, the court distinguishes between facial and factual attacks; on a factual attack, the court may look beyond the pleadings to determine jurisdictional facts. For a Rule 12(b)(6) motion, the court accepts well-pleaded allegations as true, draws reasonable inferences in plaintiff's favor, disregards conclusory allegations and formulaic recitations, and determines whether the remaining factual content plausibly establishes entitlement to relief.

PRECEDENTIAL VALUE	unknown
PARTIES	Michael Vincent Clinger v. Linda A. Cartisano, John J. Whelan, Gerald C. Montella, Mary Walk, Thomas Harken, William H. Clinger III, W.H. Clinger Corporation, Roy S. Cohen, Evan A. Blaker, Cohen Seglias Pallas Greenhall & Furman, Walter J. Timby, III, Paul Fellman, Gibson & Perkins, P.C., Benjamin D. Schwartz

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QUESTIONS PRESENTED

1. Whether the Rooker-Feldman doctrine deprived the federal court of subject-matter jurisdiction over claims seeking relief from injuries allegedly caused by a prior state-court judgment.
2. Whether the Judicial Defendants were entitled to judicial immunity.
3. Whether the Administrative Defendants were entitled to Eleventh Amendment or quasi-judicial immunity.
4. Whether Clinger plausibly stated claims under 42 U.S.C. §§ 1983, 1985(3), and 1986.
5. Whether the court should exercise supplemental jurisdiction over the remaining Pennsylvania state-law claims.

HOLDINGS

1. The Rooker-Feldman doctrine barred the federal court from exercising subject-matter jurisdiction because Clinger was a state-court loser complaining of injuries caused by a prior state-court judgment and seeking relief that would require review, rejection, or interference with that judgment.
2. The Judicial Defendants, Judges Linda A. Cartisano and John J. Whelan, were entitled to judicial immunity and could not be sued for actions taken while presiding over the state-court dispute, even if those actions were erroneous, malicious, or in excess of authority.
3. The Administrative Defendants were immune from suit because Pennsylvania state courts and their agencies are protected by Eleventh Amendment immunity and court administrators performing activities integral to the judicial process receive quasi-judicial immunity.
4. Clinger failed to state a § 1983 due-process claim because the Judicial and Administrative Defendants were immune and the remaining private defendants were not plausibly alleged to have acted under color of state law.
5. Clinger failed to state a § 1985(3) conspiracy claim because he did not allege discriminatory animus against an identifiable class or invidious discrimination, relying instead on conclusory allegations of

conspiracy.

6. Clinger failed to state a § 1986 neglect-to-prevent claim because the claim was asserted against defendants who were immune from suit.
7. The court declined to exercise supplemental jurisdiction over Clinger's remaining Pennsylvania state-law claims after dismissing all federal claims within its original jurisdiction.
8. The complaint was dismissed with prejudice because amendment would be futile.

KEY QUOTATIONS

“The Rooker-Feldman doctrine prevents federal courts from exercising subject matter Jurisdiction in cases where “state-court losers complain[] of injuries caused by state-court judgments rendered before the district court proceedings commenced and invit[e] district court review and rejection of those judgments.”” (at 7)

“Judges who properly preside over a dispute in state court retain judicial immunity even if “the action[s] [they] took w[ere] in error, done maliciously, or w[ere] in excess of [their] authority.”” (at 9)

“To survive a Rule 12(b)(6) motion, “a complaint must contain sufficient factual matter, accepted as true, to ‘state a claim to relief that is plausible on its face.’”” (at 10)

“Because amendment to the Complaint is futile, the dismissal is with prejudice.” (at 11)

FACTUAL BACKGROUND

Clinger alleged that fourteen defendants conspired to deprive him of property and financial interests in the W.H. Clinger Corporation, including by seizing corporate control, freezing accounts, and denying access to property and courts. The alleged injuries arose from a 2020 Delaware County state-court action in which a default judgment was entered against Clinger while he was incarcerated and apparently failed to respond. In the federal action, Clinger sought relief that would recognize him as the corporation's sole lawful owner and vacate or halt enforcement of orders and proceedings in the state case.

PROCEDURAL HISTORY

Clinger filed the federal complaint on September 12, 2025, along with a motion for a temporary restraining order. The court denied two TRO motions and permitted a possible later motion for a preliminary injunction after service. Defendants filed six motions to dismiss, plaintiff filed omnibus oppositions, defendants filed a joint reply, and the court granted dismissal based on lack of subject-matter jurisdiction, immunity, and failure to state a claim. The court declined supplemental jurisdiction over the remaining state-law claims and dismissed the action with prejudice because amendment would be futile.

DISPOSITION

dismissed

CASES CITED

- Constitution Party of Pennsylvania v. Aichele, 757 F.3d 347, 357-58 (3d Cir.)

- Schering Plough Corp. Intron, 678 F.3d 235, 243 (3d Cir.)
- FCS Capital LLC v. Thomas, 579 F. Supp. 3d 365, 647 (E.D. Pa.)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 556, 570 (2007)
- McTernan v. City of York, 577 F.3d 521, 526 (3d Cir.)
- M&M Stone Co. v. Pennsylvania, 388 Fed. Appx. 156, 162 (3d Cir.)
- Lutz v. Portfolio Recovery Associates, LLC, 49 F.4th 323, 327-28 (3d Cir.)
- Great Western Mining & Mineral Co. v. Fox Rothschild LLP, 615 F.3d 159, 164, 167, 169 (3d Cir.)
- Stump v. Sparkman, 435 U.S. 349, 355-56 (1978)
- Bradley v. Fisher, 80 U.S. 335, 347 (1871)
- Chilcott v. Erie County Domestic Relations, 283 Fed. Appx. 8, 10 (3d Cir.)
- Benn v. First Judicial District of Pennsylvania, 426 F.3d 233, 239 (3d Cir. 2005)
- Addlespurger v. Corbett, 461 Fed. Appx. 82, 85 (3d Cir.)
- Polk County v. Dodson, 454 U.S. 312, 318-19 (1981)
- United Brotherhood of Carpenters & Joiners v. Scott, 463 U.S. 825, 828-29 (1983)
- Farber v. City of Paterson, 440 F.3d 131, 135 (3d Cir.)