

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MISSOURI, EASTERN DIVISION

Burchfield v. City of Berkeley Police Department, et al.

Burchfield · No. 4:25-cv-00847-MTS · Decided December 9, 2025

SUMMARY

The United States District Court for the Eastern District of Missouri denied Lisa Sharon Burchfield’s motion for a temporary restraining order and preliminary injunction under Federal Rule of Civil Procedure 65. The court held that her allegations of past police harassment, ticketing, and assault did not establish a likelihood of success or an immediate, non-speculative threat of irreparable harm, and noted limits on relief affecting municipal proceedings or judicial officers.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Eastern Division
JURISDICTION	United States District Court for the Eastern District of Missouri, Eastern Division
DECIDED	December 9, 2025
DOCKET	4:25-cv-00847-MTS
DISPOSITION	denied
PROCEDURAL POSTURE	Plaintiff moved for a temporary restraining order and preliminary injunction under Federal Rule of Civil Procedure 65. The district court denied the motion.
STANDARD OF REVIEW	A temporary restraining order or preliminary injunction is an extraordinary remedy requiring a clear showing of entitlement, including a likelihood of success on the merits and an immediate, non-speculative threat of irreparable harm.
PRECEDENTIAL VALUE	Unknown
PARTIES	Lisa Sharon Burchfield v. City of Berkeley Police Department, et al.

TOPICS

- injunctions
- section 1983
- civil procedure
- civil rights
- municipal law

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Burchfield demonstrated entitlement to a temporary restraining order or preliminary injunction under Federal Rule of Civil Procedure 65.
2. Whether allegations concerning past events established an immediate, non-speculative threat of future irreparable harm.
3. Whether the requested injunction was unavailable insofar as it sought to interfere with an ongoing municipal proceeding or enjoin a judicial officer acting in a judicial capacity.

HOLDINGS

1. Burchfield was not entitled to emergency injunctive relief because she failed to demonstrate a likelihood of success on the merits or an immediate threat of irreparable harm.
2. To the extent Burchfield sought to enjoin an upcoming municipal proceeding or obtain injunctive relief against a judicial officer acting in a judicial capacity, that relief was unavailable under governing law absent the circumstances required for an exception to abstention.

KEY QUOTATIONS

“Under Federal Rule of Civil Procedure 65, such relief is an extraordinary remedy, appropriate only upon a clear showing of irreparable harm.”

“These allegations concern past events and do not establish any immediate, non-speculative threat of future irreparable injury.”

FACTUAL BACKGROUND

Burchfield alleged police harassment, unlawful ticketing in 2023, and an assault by a Berkeley police officer in August 2025. She sought broad emergency relief, including an order prohibiting officers from approaching or contacting her and a 300-yard exclusion zone around her home, vehicle, and workplace. She also appeared to seek relief concerning an upcoming municipal proceeding and against a judicial officer acting in a judicial capacity.

PROCEDURAL HISTORY

Burchfield filed an action against the City of Berkeley Police Department and related defendants and sought emergency injunctive relief based on allegations of police harassment, unlawful ticketing, and an alleged assault. The district court denied the motion and stated that it would address the complaint and the motion to proceed in forma pauperis in the ordinary course.

DISPOSITION

denied

CASES CITED

- Gen. Motors Corp. v. Harry Brown's, LLC, 563 F.3d 312, 318–19 (8th Cir. 2009)
- Dataphase Sys., Inc. v. C L Sys., Inc., 640 F.2d 109, 114 (8th Cir. 1981) (en banc)
- H&R Block, Inc. v. Block, Inc., 58 F.4th 939, 951 (8th Cir. 2023)
- Night Clubs, Inc. v. City of Fort Smith, 163 F.3d 475, 479–81 (8th Cir. 1998)
- Younger v. Harris, 401 U.S. 37 (1971)

OPINION

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION LISA SHARON BURCHFIELD,)) Plaintiff,)) v.) No. 4:25-cv-00847-MTS) CITY OF BERKELEY POLICE) DEPARTMENT, et al.,)) Defendants.) MEMORANDUM AND ORDER Plaintiff Lisa Sharon Burchfield, a self-represented litigant, moves for a temporary restraining order and preliminary injunction.

Doc. [7]. Under Federal Rule of Civil Procedure 65, such relief is an extraordinary remedy, appropriate only upon a clear showing of irreparable harm. See Gen. Motors Corp. v. Harry Brown's, LLC, 563 F.3d 312, 318–19 (8th Cir. 2009).

Having reviewed the Motion and considered the proper standard, the Court finds no basis for immediate injunctive relief. See Dataphase Sys., Inc. v. C L Sys., Inc., 640 F.2d 109, 114 (8th Cir. 1981) (en banc) (listing factors to consider). Even construing the Motion liberally, Burchfield fails to demonstrate a likelihood of success on the merits or an immediate threat of irreparable harm.

See *id.* Her motion consists of broad and conclusory allegations of police harassment, unlawful ticketing in 2023, and an alleged assault by a Berkeley police officer in August 2025. Doc. [7] at 1–3. These allegations concern past events and do not establish any immediate, non-speculative threat of future irreparable injury. See H&R Block, Inc. v. Block, Inc., 58 F.4th 939, 951 (8th Cir.

2023). Furthermore, Burchfield's requested relief—including prohibiting any officer from approaching or contacting her and imposing a 300-yard exclusion zone around her home, vehicle, and workplace—is sweeping, unsupported by factual detail, and beyond the scope of emergency relief available under Rule 65. Additionally, to the extent Burchfield seeks to enjoin an upcoming municipal proceeding or obtain injunctive relief against a judicial officer acting in a judicial capacity, such relief is unavailable as a matter of law.

See 42 U.S.C. § 1983 (limiting injunctive relief against judicial officers); see also Night Clubs, Inc. v. City of Fort Smith, 163 F.3d 475, 479–81 (8th Cir. 1998) (holding federal courts may not interfere with ongoing state or municipal proceedings absent bad faith, harassment, or other extraordinary circumstances (applying Younger v. Harris, 401 U.S. 37 (1971))).

Because Burchfield has not shown circumstances warranting emergency or preliminary relief, the Court will deny her Motion. The Court will address Burchfield's Complaint and Motion to Proceed in Forma Pauperis in the ordinary course.

Accordingly, IT IS HEREBY ORDERED that Burchfield's Motion for Temporary Restraining Order and Preliminary Injunction, Doc. [7], is DENIED. Dated this 9th day of December 2025.)
fA UNITED STATES DISTRICT JUDGE