

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
ALABAMA, NORTHERN DIVISION

Jessica Jay Scott, et al. v. Chilton County Department of Human
Resources, et al.

Scott · No. 2:25-cv-928-RAH · Decided March 31, 2026

SUMMARY

The United States District Court for the Middle District of Alabama dismissed without prejudice a federal civil rights action arising from ongoing state child-removal and termination-of-parental-rights proceedings. The court declined to apply the domestic relations exception to federal-question jurisdiction but abstained under Younger, finding that the requested relief would interfere with important ongoing state proceedings. The court also concluded that the complaint was an impermissible shotgun pleading and directed the clerk to close the case.

CASE DETAILS

COURT	United States District Court for the Middle District of Alabama, Northern Division
WRITING FOR THE COURT	R. Austin Huffaker Jr.
JURISDICTION	United States District Court for the Middle District of Alabama, Northern Division
DECIDED	March 31, 2026
DOCKET	2:25-cv-928-RAH
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiffs objected to a magistrate judge's Report and Recommendation recommending dismissal for lack of subject matter jurisdiction under the domestic relations exception. The district court reviewed the objections de novo, rejected application of the domestic relations exception, but dismissed the action without prejudice under Younger abstention and because the complaint was a shotgun pleading.
STANDARD OF REVIEW	Under 28 U.S.C. § 636(b)(1), objected portions of a magistrate judge's recommendation are reviewed de novo, while unobjected portions are reviewed for clear error. A district judge may accept, reject, or modify the recommendation.

PRECEDENTIAL VALUE	unknown
PARTIES	Jessica Jay Scott, John Burton Eubanks, Jr. v. Chilton County Department of Human Resources, Chilton County Sheriff's Department, Mallory Ratliff, Dayla Hamilton, Ali Patterson, Shane Mayfield, Judge Christopher G. Speaks

TOPICS

subject matter jurisdiction civil procedure pleadings injunctions termination of parental rights

PRACTICE AREAS

civil procedure family law constitutional law civil rights

QUESTIONS PRESENTED

1. Whether the domestic relations exception deprived the district court of federal-question jurisdiction over plaintiffs' constitutional and 42 U.S.C. § 1983 claims.
2. Whether Younger abstention required dismissal of claims seeking to halt or interfere with ongoing state child-protection and termination-of-parental-rights proceedings.
3. Whether Younger abstention could apply to plaintiffs' § 1983 claims for damages arising from the ongoing state proceedings.
4. Whether the complaint was an impermissible shotgun pleading because it asserted conclusory allegations and failed to identify which defendant was responsible for which conduct.
5. Whether plaintiffs should receive leave to amend.

HOLDINGS

1. The domestic relations exception does not categorically bar this action because plaintiffs invoked federal-question jurisdiction under 28 U.S.C. § 1331 and asserted constitutional and § 1983 claims. The court declined to extend the exception to this federal-question action.
2. Younger abstention required dismissal without prejudice of plaintiffs' claims for injunctive relief because the requested injunction would halt or interfere with ongoing state termination-of-parental-rights proceedings, the proceedings implicated important state interests, and plaintiffs had not shown that the state proceedings lacked an adequate opportunity to raise their federal claims.
3. The court dismissed without prejudice plaintiffs' § 1983 damages claims under Younger because the ongoing state proceedings implicated important state interests, plaintiffs had not shown that the state forum could not address their alleged constitutional violations, and adjudicating the claims would interfere with the state court's resolution of the termination proceedings.
4. The complaint was a shotgun pleading subject to dismissal because it contained conclusory allegations lacking factual support and failed to distinguish which defendant was responsible for which alleged acts or omissions.

KEY QUOTATIONS

“Younger abstention bars federal court intervention in “ongoing state judicial proceeding[s]” where “the proceedings implicate important state interests[] and there is an adequate opportunity in the state proceedings to raise constitutional challenges.”” (Discussion § B)

“The unifying characteristic of all types of shotgun pleadings is that they fail to one degree or another, and in one way or another, to give the defendants adequate notice of the claims against them and the grounds upon which each claim rests.” (Discussion § C)

FACTUAL BACKGROUND

Plaintiffs alleged that defendants removed their children after plaintiffs were charged with child abuse. Although plaintiffs were acquitted after a jury trial, defendants allegedly did not return the children and instead initiated termination-of-parental-rights proceedings in state court. Plaintiffs sought damages and injunctive relief, including an order halting the termination proceedings and restoring custody. They also alleged that defendants intended to present inaccurate or misleading evidence in the state proceedings.

PROCEDURAL HISTORY

Plaintiffs filed a federal civil-rights action arising from ongoing state termination-of-parental-rights proceedings. The matter was referred to a magistrate judge, who recommended dismissal under the domestic relations exception. Plaintiffs timely objected, arguing that federal-question jurisdiction existed and that they sought damages and declaratory rather than prospective injunctive relief. The district court sustained the objections in part, rejected the domestic-relations rationale, adopted and rejected portions of the Report and Recommendation, and dismissed the complaint without prejudice.

DISPOSITION

dismissed

CASES CITED

- United States v. Raddatz, 447 U.S. 667, 680 (1980)
- Marsden v. Moore, 847 F.2d 1536, 1548 (11th Cir. 1988)
- University of South Alabama v. American Tobacco Co., 168 F.3d 405, 409 (11th Cir. 1999)
- Ankenbrandt v. Richards, 504 U.S. 689, 704 (1992)
- Ingram v. Hayes, 866 F.2d 368, 370-72 (11th Cir. 1988)
- Carver v. Carver, 954 F.2d 1573, 1578 (11th Cir. 1992)
- Sprint Communications, Inc. v. Jacobs, 571 U.S. 69, 77 (2013)
- New Orleans Public Service, Inc. v. Council of City of New Orleans, 491 U.S. 350, 367-68 (1989)
- Moore v. Sims, 442 U.S. 415, 419-20 (1979)
- Adams v. Florida, 185 F. App'x 816, 816-17 (11th Cir. 2006) (per curiam)
- 31 Foster Children v. Bush, 329 F.3d 1255, 1276-79 (11th Cir. 2003)

- *Butler v. Alabama Judicial Inquiry Commission*, 261 F.3d 1154, 1159 (11th Cir. 2001)
- *Pennzoil Co. v. Texaco, Inc.*, 481 U.S. 1, 15 (1987)
- *Santosky v. Kramer*, 455 U.S. 745, 766 (1982)
- *Doe v. Kearney*, 329 F.3d 1286, 1293 (11th Cir. 2003)
- *Newton v. Duke Energy Florida, LLC*, 895 F.3d 1270, 1277 (11th Cir. 2018)
- *Doby v. Strength*, 758 F.2d 1405, 1406 (11th Cir. 1985)
- *Prather v. Norman*, 901 F.2d 915, 919 (11th Cir. 1990)
- *Deakins v. Monaghan*, 484 U.S. 193, 202 (1988)
- *Stoddard v. Florida Board of Bar Examiners*, 509 F. Supp. 2d 1117 (N.D. Fla. 2006), *aff'd*, 229 F. App'x 911 (11th Cir. 2007)
- *Boyd v. Georgia*, 512 F. App'x 915, 918 (11th Cir. 2013)
- *Quackenbush*
- *Ford v. Tait*, 163 F. Supp. 2d 57, 67 (D.D.C. 2001)
- *Stein v. Legal Advertising Committee of Discipline Board*, 272 F. Supp. 2d 1260, 1275 (D.N.M. 2003)
- *Discovery House, Inc. v. Consolidated City of Indianapolis*, 970 F. Supp. 655, 660-61 (S.D. Ind. 1997)
- *Wideman v. Colorado*, 242 F. App'x 611
- *McKinney v. Pate*, 20 F.3d 1550, 1560 (11th Cir. 1994)
- *Stubbs v. City of Center Point*, 988 F. Supp. 2d 1270, 1280 (N.D. Ala. 2013)
- *Weiland v. Palm Beach County Sheriff's Office*, 792 F.3d 1313, 1323 (11th Cir. 2015)
- *Brown v. Air Line Pilots Association*, 813 F. App'x 353, 355 (11th Cir. 2020)
- *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009)
- *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544, 557 (2007)
- *Magluta v. Samples*, 256 F.3d 1282, 1284 (11th Cir. 2001)
- *Jackson v. Bank of America, N.A.*, 898 F.3d 1348, 1357 (11th Cir. 2018)