

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK

Wallick Richardson v. Gabriella F. Richman, et al.

Richardson v. Richman · No. 25-CV-5155 (PKC) (MMH) · Decided December 15, 2025

SUMMARY

The United States District Court for the Eastern District of New York dismissed Wallick Richardson’s pro se action against New York State Family Court administrative officers without prejudice for lack of subject matter jurisdiction. The court held that the claims, which challenged the enforcement and validity of a state child support order, were subject to domestic-relations abstention, and Plaintiff did not respond to the court’s order to explain why federal jurisdiction should apply. The court also denied in forma pauperis status for any appeal.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                                                             |
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| COURT                 | United States District Court for the Eastern District of New York                                                                                                                                                                                                                                                                                                                                           |
| WRITING FOR THE COURT | Pamela K. Chen                                                                                                                                                                                                                                                                                                                                                                                              |
| JURISDICTION          | United States District Court for the Eastern District of New York                                                                                                                                                                                                                                                                                                                                           |
| DECIDED               | December 15, 2025                                                                                                                                                                                                                                                                                                                                                                                           |
| DOCKET                | 25-CV-5155 (PKC) (MMH)                                                                                                                                                                                                                                                                                                                                                                                      |
| DISPOSITION           | dismissed                                                                                                                                                                                                                                                                                                                                                                                                   |
| PROCEDURAL POSTURE    | Pro se plaintiff brought a civil-rights action against four New York State Family Court administrative officers in their official capacities, challenging his child-support obligations. The court previously ordered plaintiff to explain why the action should not be dismissed for lack of subject matter jurisdiction; after plaintiff filed nothing, the court dismissed the action without prejudice. |
| PRECEDENTIAL VALUE    | Unpublished district court memorandum and order; persuasive value only.                                                                                                                                                                                                                                                                                                                                     |
| PARTIES               | Wallick Richardson v. Gabriella F. Richman, et al.                                                                                                                                                                                                                                                                                                                                                          |

TOPICS

- subject matter jurisdiction
- family law procedure
- child support
- civil rights
- section 1983

PRACTICE AREAS

## QUESTIONS PRESENTED

1. Whether the federal district court could exercise subject matter jurisdiction over claims concerning the enforcement and validity of a state-court child-support order.
2. Whether the action should be dismissed without prejudice after plaintiff failed to respond to the court's jurisdictional order.

## HOLDINGS

1. The domestic-relations abstention doctrine required the federal district court to abstain from exercising subject matter jurisdiction over plaintiff's claims because they concerned the enforcement and validity of a state-court child-support order and could be fully and fairly determined in state court.
2. The action was dismissed without prejudice for lack of subject matter jurisdiction after plaintiff failed to file the required submission explaining why federal jurisdiction should be exercised.

## KEY QUOTATIONS

*“Since Plaintiff’s claims concern only the enforcement and validity of a state court’s child support order, this case falls under the scope of the domestic-relations abstention doctrine”* (at 3)

*“to abstain from exercising subject matter jurisdiction over claims involving domestic relations issues when those claims can be fully and fairly determined in the state courts.”* (at 3)

## FACTUAL BACKGROUND

Wallick Richardson challenged his child-support obligations and alleged civil-rights violations against four New York State Family Court administrative officers sued in their official capacities. His claims concerned the enforcement and validity of a state-court child-support order. After the court ordered him to explain why federal subject matter jurisdiction existed, he filed no further submission.

## PROCEDURAL HISTORY

Plaintiff commenced the action on September 18, 2025. On October 21, 2025, the court concluded that the claims concerning enforcement and validity of a state-court child-support order fell within the domestic-relations abstention doctrine and allowed plaintiff until November 20, 2025, to explain why the case should not be dismissed. Plaintiff made no further filings, so the court dismissed the action without prejudice, directed entry of judgment and closure of the case, and denied in forma pauperis status for any appeal.

## DISPOSITION

dismissed

## CASES CITED

- *Am. Airlines, Inc. v. Block*, 905 F.2d 12, 14 (2d Cir. 1990)

- *Deem v. DiMella-Deem*, 941 F.3d 618, 621 (2d Cir. 2019)
- *Legister v. Radowitz*, No. 20-CV-9330 (LLS), 2020 WL 7405672, at \*4 (S.D.N.Y. Dec. 16, 2020)
- *Myers v. Sara Lee Corp.*, No. 08-CV-1421 (KAM), 2009 WL 10706711, at \*10 (E.D.N.Y. Apr. 13, 2009)
- *Coppedge v. United States*, 369 U.S. 438, 444–45 (1962)

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