

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
INDIANA, INDIANAPOLIS DIVISION

Joy D. Rugenstein v. Matthew H. Hanson, et al.

Rugenstein v. Hanson · No. 1:25-cv-02276-SEB-MKK · Decided May 15, 2026

SUMMARY

The United States District Court for the Southern District of Indiana considered motions to dismiss and a request for emergency injunctive relief in a § 1983 action challenging ongoing state-court child custody and support proceedings. The court granted the defendants’ motions to dismiss without prejudice based on abstention principles concerning interference with state domestic-relations proceedings, denied the injunction motion as moot, and ordered the plaintiff to show cause why final judgment should not enter.

CASE DETAILS

COURT	United States District Court for the Southern District of Indiana, Indianapolis Division
WRITING FOR THE COURT	Sarah Evans Barker
JURISDICTION	United States District Court for the Southern District of Indiana, Indianapolis Division
DECIDED	May 15, 2026
DOCKET	1:25-cv-02276-SEB-MKK
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff brought a 42 U.S.C. § 1983 action challenging aspects of ongoing state-court child-custody and domestic-relations proceedings. The district court considered defendants' motions to dismiss for lack of subject-matter jurisdiction and plaintiff's emergency motion for a preliminary injunction and temporary restraining order.
STANDARD OF REVIEW	The court considered whether it could exercise federal jurisdiction over claims seeking to affect ongoing state domestic-relations proceedings; it dismissed for lack of subject-matter jurisdiction without prejudice.
PRECEDENTIAL VALUE	Unpublished federal district court order; not precedential.
PARTIES	Joy D. Rugenstein v. Matthew H. Hanson, Morgan County, Indiana, Jennifer Jones Auger, Denise Hayden, Kevin Byrd, Ph.D., Tyson

TOPICS

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QUESTIONS PRESENTED

1. Whether the federal court should exercise jurisdiction over constitutional claims that seek to affect ongoing state-court domestic-relations proceedings.
2. Whether plaintiff was entitled to a preliminary injunction or temporary restraining order discontinuing child-support payments ordered in the state divorce proceeding.

HOLDINGS

1. A federal court should abstain from adjudicating constitutional claims when the federal action is designed to obtain a favorable ruling that would shape or change ongoing state-court domestic-relations proceedings, particularly where the plaintiff has not plausibly shown that the state courts are unwilling or unable to address the claims.
2. The emergency motion for a preliminary injunction and temporary restraining order was denied as moot because the underlying action was dismissed without prejudice for lack of subject-matter jurisdiction.

KEY QUOTATIONS

"It is well-settled under Seventh Circuit law that the foundational legal principles of equity, comity, and federalism compel federal courts to abstain from adjudicating disputes "where doing so would intrude upon the independence of the state courts and their ability to resolve the cases before them.""

"'Unless and until the state courts have proven unwilling to address" Ms. Rugenstein's alleged constitutional claims, "the federal courts should not exercise jurisdiction over the matter."'

FACTUAL BACKGROUND

Rugenstein challenged ongoing state-court child-custody and divorce-related proceedings, alleging violations of the Fourteenth Amendment involving child-support enforcement, access to court proceedings, evidentiary rulings, and interference with the parent-child relationship. She sought emergency injunctive relief to discontinue required child-support payments ordered in the state divorce proceeding. The state domestic-relations proceeding remained ongoing, and the court found no plausible allegation that state procedures prevented her from presenting her constitutional claims in state court.

PROCEDURAL HISTORY

The action was filed in federal district court while the underlying domestic-relations proceeding remained ongoing in Indiana state court. Plaintiff amended her complaint, making earlier motions directed to the original complaint moot. The district court granted defendants' joinder and motions to dismiss without prejudice for lack of subject-matter jurisdiction, denied the emergency injunctive motions as moot, and ordered plaintiff to show cause within fourteen days why final judgment should not enter.

DISPOSITION

dismissed

CASES CITED

- J.B. v. Woodward, 997 F.3d 714, 721–22 (7th Cir. 2021)
- Courthouse News Service v. Brown, 908 F.3d 1063, 1071 (7th Cir.)