

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE, NASHVILLE DIVISION

Shontavius Martin, et al. v. Williamson County Schools, et al.

No. 3:26-cv-00006 (M.D. Tenn. Jan. 12, 2026) · No. 3:26-cv-00006 · Decided January 12, 2026

SUMMARY

The United States District Court for the Middle District of Tennessee applies Younger abstention to an action challenging ongoing Tennessee dependency-and-neglect and truancy proceedings. The court finds that the proceedings implicate important state interests and that the plaintiffs have not shown that they lack an adequate opportunity to raise constitutional claims or that an exception to abstention applies, and it stays and administratively closes the federal action.

CASE DETAILS

COURT	United States District Court for the Middle District of Tennessee, Nashville Division
WRITING FOR THE COURT	Aleta A. Trauger
JURISDICTION	United States District Court for the Middle District of Tennessee, Nashville Division
DECIDED	January 12, 2026
DOCKET	3:26-cv-00006
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiffs brought a civil-rights action under 42 U.S.C. § 1983 seeking damages, injunctive relief, and declaratory relief concerning ongoing Tennessee dependency-and-neglect and truancy proceedings. The district court conducted initial screening under 28 U.S.C. § 1915(e)(2) and stayed the federal action under Younger abstention.
STANDARD OF REVIEW	Initial screening under 28 U.S.C. § 1915(e)(2)(B); the court construed the pro se complaint liberally and accepted factual allegations as true unless entirely incredible.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion and order; precedential status unknown

PARTIES

Shontavius Martin, Sable Hicks v. Williamson County Schools, Sunset Elementary School, Christina Aaron, Lori Quin, Aniesha Randall, Sean Noblit, Judge Derek Smith

TOPICS

civil procedure

family law procedure

procedural due process

constitutional law

injunctions

PRACTICE AREAS

civil rights

constitutional law

civil procedure

family law

QUESTIONS PRESENTED

1. Whether the federal action should be stayed under Younger abstention because related state dependency-and-neglect and truancy proceedings were ongoing.
2. Whether the alleged inadequacy of the state forum, bad faith, or harassment supported an exception to Younger abstention.
3. Whether Plaintiffs' motions for a temporary restraining order and to expedite a hearing should be denied while the federal action was stayed.

HOLDINGS

1. Younger abstention applies where related state judicial proceedings are ongoing, the proceedings implicate important state interests, and the plaintiff has an adequate opportunity to raise constitutional challenges in the state proceedings.
2. Younger abstention is appropriate unless state law clearly bars the plaintiff from presenting constitutional claims in the state proceedings, and the plaintiff bears the burden of showing that state law creates such a bar.
3. Allegations of bad faith or harassment do not establish an exception to Younger abstention without a sufficient showing that the state proceedings were brought or pursued in bad faith or for purposes of harassment.

KEY QUOTATIONS

“Because the requirements for Younger abstention are met and Plaintiffs have not demonstrated that an exception applies, the court will stay this action while state proceedings are ongoing.”

“This action is STAYED until resolution of the related ongoing state proceedings.”

FACTUAL BACKGROUND

Plaintiffs alleged that state dependency-and-neglect and truancy proceedings arose after their children were withdrawn from Sunset Elementary School and enrolled in a virtual school. They alleged that school and state officials withheld student records, initiated or pursued truancy proceedings, and treated Plaintiffs as failing to

appear at a hearing despite Sable Hicks's surgery and medically required bed rest. The state proceedings were later merged and remained ongoing when Plaintiffs filed this federal civil-rights action.

PROCEDURAL HISTORY

Plaintiffs filed the action while related state dependency-and-neglect and truancy proceedings remained ongoing. Upon initial review, the district court determined that Younger abstention applied because the state proceedings were ongoing, implicated important state interests, and provided an adequate opportunity to present constitutional claims. The court stayed the federal action, administratively closed the case, and denied the pending motions for a temporary restraining order and expedited hearing without prejudice.

DISPOSITION

other

CASES CITED

- Moore v. Sims, 442 U.S. 415, 423 (1979)
- Younger v. Harris, 401 U.S. 37 (1971)
- O'Neill v. Coughlan, 511 F.3d 638, 643 (6th Cir. 2008)
- Squire v. Coughlan, 469 F.3d 551, 556 (6th Cir. 2006)
- American Family Prepaid Legal Corp. v. Columbus Bar Ass'n, 498 F.3d 328, 335-36 (6th Cir. 2007)
- Fieger v. Thomas, 74 F.3d 740, 750 (6th Cir. 1996)
- United States v. Smotherman, 838 F.3d 736, 739 (6th Cir. 2016)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Thomas v. Eby, 481 F.3d 434, 437 (6th Cir. 2007)
- Denton v. Hernandez, 504 U.S. 25, 33 (1992)
- Haines v. Kerner, 404 U.S. 519, 520-21 (1972)
- Jourdan v. Jabe, 951 F.2d 108, 110 (6th Cir. 1991)
- McDonald v. Hall, 610 F.2d 16, 19 (1st Cir. 1979)

OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION SHONTAVIUS MARTIN, et al.,)) Plaintiffs,)) v.) No. 3:26-cv-00006) WILLIAMSON COUNTY SCHOOLS,) Judge Trauger et al.,)) Defendants.) MEMORANDUM OPINION AND ORDER Plaintiffs Shontavius Martin and Sable Hicks brought this action on behalf of themselves and their minor children, alleging violations of their civil rights.

(Doc. No. 1). Plaintiffs’ complaint is now before the court for initial review. See 28 U.S.C. § 1915(e)(2). SCREENING STANDARD The court must dismiss any portion of a civil complaint

filed in forma pauperis that fails to state a claim upon which relief can be granted, is frivolous, or seeks monetary relief from a defendant who is immune from such relief. 28 U.S.C. § 1915(e)(2) (B).

The court must construe a pro se complaint liberally, *United States v. Smotherman*, 838 F.3d 736, 739 (6th Cir. 2016) (citing *Erickson v. Pardus*, 551 U.S. 89, 94 (2007)), and accept Plaintiffs' factual allegations as true unless they are entirely without credibility. See *Thomas v. Eby*, 481 F.3d 434, 437 (6th Cir. 2007) (citing *Denton v. Hernandez*, 504 U.S. 25, 33 (1992)).

Although pro se pleadings are to be held to a less stringent standard than formal pleadings drafted by lawyers, *Haines v. Kerner*, 404 U.S. 519, 520–21 (1972); *Jourdan v. Jabe*, 951 F.2d 108, 110 (6th Cir. 1991), the court's "duty to be 'less stringent' with pro se complaints does not require us to conjure up [unpleaded] allegations." *McDonald v. Hall*, 610 F.2d 16, 19 (1st Cir.

1979) (citation omitted). FACTUAL ALLEGATIONS¹ AND CLAIMS Plaintiffs sue Williamson County Schools, Sunset Elementary School, Christina Aaron (principal at Sunset Elementary), Lori Quin (truancy officer), Aniesha Randall (Department of Children's Services ("DCS") caseworker), Sean Noblit (DCS attorney), and Judge Derek Smith. (Doc. No. 1 at 1–2). Plaintiffs allege that DCS "opened a case involving Plaintiffs' family" on or about August 25, 2025.

(Id. at 2). A dependency-and-neglect proceeding was later initiated. (Id. at 2–3). Also in August 2025, Plaintiffs initiated a withdrawal from Sunset Elementary. (Id. at 2). Sunset Elementary and Williamson County Schools withheld student records and documentation, preventing Plaintiffs from transferring their children to another school. (Id.)

On November 3, 2025, Plaintiffs' children were "enrolled in a lawful public K–12 virtual school." (Id.) The children were officially withdrawn from Sunset Elementary on November 5, 2025. (Id.) On November 17, 2025, Officer Quin brought a truancy petition against Plaintiffs. (Id.) Plaintiffs assert that the petition did not comply with various procedural requirements.

(Id.) Ms. Hicks underwent surgery "from approximately November 19, 2025 through November 25, 2025, followed by medically required bed rest." (Id.) Plaintiffs did not appear at a court hearing on December 1, 2025. (Id.) Defendants knew of Ms. Hicks's medical condition but treated Plaintiffs as failing to appear at the court hearing. (Id.)

In December 2025, the Plaintiffs' dependency-and-neglect proceedings were merged with the truancy proceedings. (Id. at 3). These proceedings are ongoing. (Id.) ¹ The court makes no factual findings regarding the truth of Plaintiffs' allegations.

For purposes of this order, the court presents the allegations as alleged in the complaint. Plaintiffs assert that Defendants' actions violated their rights to procedural and substantive due process

under the Fourteenth Amendment. (Id.) They further assert claims of First Amendment retaliation and “Unreasonable Seizure/Intrusion” under the Fourth Amendment.

(Id.) They seek damages, injunctive relief, and declaratory relief. (Id. at 4). ANALYSIS Federal courts apply a “strong policy against federal intervention in state judicial processes in the absence of great and immediate irreparable injury to the federal plaintiff.” *Moore v. Sims*, 442 U.S. 415, 423 (1979) (citing *Younger v. Harris*, 401 U.S. 37 (1971)). This doctrine, known by the shorthand of “Younger abstention,” applies both to state criminal proceedings and “civil proceedings in which important state interests are involved.” Id. Younger abstention is applicable where three requirements are satisfied: “(1) there must be [related] on-going state judicial proceedings; (2) those proceedings must implicate important state interests; and (3) there must be an adequate opportunity in the state proceedings to raise constitutional challenges.” *O’Neill v. Coughlan*, 511 F.3d 638, 643 (6th Cir.

2008). Plaintiffs do not appear to dispute the first two requirements. Plaintiffs allege ongoing state judicial proceedings; indeed, they seek to enjoin those proceedings. (Doc. No. 1 at 2, 4). Plaintiffs also allege that the proceedings implicate family law and state intervention in the parent-child relationship. (Id. at 2–3). These types of proceedings implicate important state interests.

See *Moore*, 442 U.S. at 423 (applying Younger abstention when underlying state-court proceedings involved removal of children due to allegations of abuse and neglect). Plaintiffs do dispute the third requirement for Younger abstention, arguing that “the state forum is not an adequate vehicle to vindicate federal rights where the continuation itself is the violation and the court actors have been placed on notice yet proceeded anyway.” (Doc.

No. 1 at 3). However, “[a]bstention is appropriate unless state law clearly bars the interposition of the constitutional claims.” *Squire v. Coughlan*, 469 F.3d 551, 556 (6th Cir. 2006) (quotation marks omitted). “The plaintiff bears the burden of showing that state law barred presentation of his or her constitutional claims.” Id. Here, Plaintiffs do not assert, let alone demonstrate, that state law bars them from raising their constitutional claims.

Plaintiffs also allege that Defendants are acting in “bad faith” and with the purpose of “harassment.” (Doc. No. 1 at 3). A showing of bad faith or harassment would warrant an exception to Younger abstention. See *American Family Prepaid Legal Corp. v. Columbus Bar Ass’n*, 498 F.3d 328, 335–336 (6th Cir. 2007).

However, Plaintiffs make no such showing here. At most, Plaintiffs allege a disagreement about the propriety of the state proceedings. They put forth no evidence of targeted harassment or bad faith. Cf. *Fieger v. Thomas*, 74 F.3d 740, 750 (6th Cir. 1996) (finding no bad faith to preclude Younger abstention because plaintiff “ha[d] not demonstrated that the Commission’s actions against him were motivated by bad-faith or with intent to harass.” (emphasis in original)).

Because the requirements for Younger abstention are met and Plaintiffs have not demonstrated that an exception applies, the court will stay this action while state proceedings are ongoing. CONCLUSION This action is STAYED until resolution of the related ongoing state proceedings.

The Clerk SHALL administratively close this case, and Plaintiffs shall notify the court upon the resolution of state-court proceedings, at which point the case may be reopened if appropriate. Plaintiffs' Renewed Motion for Temporary Restraining Order (Doc. No. 9) and Emergency Motion to Expedite Hearing (Doc. No. 10) are DENIED without prejudice to refiling upon reopening of these proceedings.

It is so ORDERED. Uy Aleta A. Trauger United States District Judge