

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)