

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WASHINGTON

Mikal Cordova Harrison v. Judge Monica K. Cary, in Her Personal
and Official Capacities, and Tarrell Harrison, Jr., in His Individual
Capacity

Harrison · No. 2:26-cv-00353-JNW · Decided February 4, 2026

SUMMARY

The United States District Court for the Western District of Washington denies Mikal Cordova Harrison’s ex parte motion for a temporary restraining order seeking to prevent enforcement of King County Superior Court family-law orders. The court concludes that Harrison failed to satisfy the procedural requirements of Federal Rule of Civil Procedure 65(b) and did not show a likelihood of success on the merits. The court also directs Harrison to show cause within 21 days why the action should not be dismissed for lack of subject-matter jurisdiction, citing possible application of the Rooker-Feldman and Younger doctrines and judicial immunity.

CASE DETAILS

COURT	United States District Court for the Western District of Washington
WRITING FOR THE COURT	Jamal N. Whitehead
JURISDICTION	United States District Court for the Western District of Washington
DECIDED	February 4, 2026
DOCKET	2:26-cv-00353-JNW
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff proceeding pro se moved ex parte for a temporary restraining order preventing enforcement of family-law orders issued by the King County Superior Court. The court denied the motion and ordered plaintiff to show cause why the action should not be dismissed for lack of subject-matter jurisdiction.
STANDARD OF REVIEW	A party seeking preliminary injunctive relief must demonstrate a likelihood of success on the merits, a likelihood of irreparable harm, that the balance of equities tips in the party's favor, and that an injunction is in the public interest. An ex parte temporary restraining order additionally requires compliance with Federal Rule of Civil Procedure 65(b)(1).

PRECEDENTIAL VALUE	Unknown; district-court order denying a temporary restraining order.
PARTIES	Mikal Cordova Harrison v. Judge Monica K. Cary, in her personal and official capacities, Tarrell Harrison, Jr., in his individual capacity

TOPICS

injunctions subject matter jurisdiction family law civil procedure

PRACTICE AREAS

civil procedure constitutional law family law remedies

QUESTIONS PRESENTED

1. Whether Harrison satisfied Federal Rule of Civil Procedure 65(b)(1)'s requirements for an ex parte temporary restraining order.
2. Whether Harrison demonstrated a likelihood of success on the merits sufficient to obtain preliminary injunctive relief.
3. Whether doctrines including Rooker-Feldman and judicial immunity appeared to foreclose some or all of Harrison's claims.
4. Whether Harrison should be ordered to show cause why the action should not be dismissed for lack of subject-matter jurisdiction.

HOLDINGS

1. The motion for an ex parte temporary restraining order was properly denied because Harrison failed to comply with Federal Rule of Civil Procedure 65(b)(1), including the requirements concerning specific facts showing immediate and irreparable injury and written certification regarding notice.
2. Harrison failed to meet her burden for temporary injunctive relief because she did not meaningfully address whether she was likely to succeed on the merits.
3. The court denied emergency relief because Harrison had not shown a likelihood of success, and identified Rooker-Feldman, possible Younger abstention, and judicial immunity as doctrines that appeared to preclude some or all claims; the court did not finally resolve the applicability of Younger.

KEY QUOTATIONS

“Motions for temporary restraining orders without notice and an opportunity to be heard by the adverse party are disfavored and will rarely be granted.” (at 1)

“injunctive relief is an extraordinary remedy that may only be awarded upon a clear showing that the plaintiff is entitled to such relief.” (at 2)

“The proper legal standard for preliminary injunctive relief requires a party to demonstrate that he is likely to succeed on the merits, that he is likely to suffer irreparable harm in the absence of preliminary relief, that the

balance of equities tips in his favor, and that an injunction is in the public interest.” (at 2)

“district courts lack subject matter jurisdiction over cases brought by state-court losers complaining of injuries caused by state-court judgments.” (at 3)

“Judicial immunity discourages collateral attacks on final judgments through civil suits, and thus promotes the use of appellate procedures as the standard system for correcting judicial error.” (at 4)

FACTUAL BACKGROUND

Harrison sought federal relief from family-law orders issued by the King County Superior Court. She alleged that the state-court judge entered erroneous orders unsupported by the record and lacking a lawful foundation, and asked the federal court to enjoin those orders. Her motion contained only conclusory discussion of the likelihood-of-success factor and did not satisfy Rule 65(b)'s requirements for an ex parte temporary restraining order.

PROCEDURAL HISTORY

Harrison filed a federal action challenging or seeking to enjoin enforcement of King County Superior Court family-law orders. She moved ex parte for a temporary restraining order. The district court denied the motion because she failed to satisfy Federal Rule of Civil Procedure 65(b)'s procedural requirements and failed to demonstrate a likelihood of success on the merits. The court also ordered her to respond within twenty-one days to concerns regarding subject-matter jurisdiction and possible dismissal.

DISPOSITION

other

CASES CITED

- Winter v. Nat. Res. Def. Council, Inc., 555 U.S. 7, 20, 22 (2008)
- Stormans, Inc. v. Selecky, 586 F.3d 1109, 1127 (9th Cir. 2009)
- Fraihat v. U.S. Immigr. & Customs Enf't, 16 F.4th 613, 635 (9th Cir. 2021)
- Planned Parenthood Great Nw., Hawaii, Alaska, Indiana, Kentucky v. Labrador, 122 F.4th 825, 843-44 (9th Cir. 2024)
- All. for the Wild Rockies v. Cottrell, 632 F.3d 1127, 1135 (9th Cir. 2011)
- Miroth v. County of Trinity, 136 F.4th 1141, 1150-51 (9th Cir. 2025)
- Kougasian v. TMSL, Inc., 359 F.3d 1136 (9th Cir. 2004)
- Younger v. Harris, 401 U.S. 37 (1971)
- ReadyLink Healthcare, Inc. v. State Comp. Ins. Fund, 754 F.3d 754, 758 (9th Cir. 2014)
- Laflam v. Hillman, 2025 WL 1898922, at *3 (W.D. Wash. July 9, 2025)
- In re Castillo, 297 F.3d 940, 947 (9th Cir. 2002)
- Forrester v. White, 484 U.S. 219, 225 (1988)

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