

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Davis v. Shepard

Davis · No. 2:24-cv-01952-DC-AC (PS) · Decided September 2, 2025

SUMMARY

The United States District Court for the Eastern District of California adopted the magistrate judge’s findings and recommendations and dismissed Eric Davon Davis’s action without prejudice for lack of subject matter jurisdiction. The court held that Davis’s challenge to state child-support orders was barred by the Rooker-Feldman doctrine and the domestic-relations exception, and that claims against certain defendants were also barred by judicial immunity. The court denied Davis’s motions for preliminary injunction, default judgment, and immediate ruling as moot and directed the clerk to close the case.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Dena Coggins
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	September 2, 2025
DOCKET	2:24-cv-01952-DC-AC (PS)
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court conducted de novo review of a magistrate judge's findings and recommendations after plaintiff filed objections. The court adopted the findings and recommendations, dismissed the complaint without prejudice for lack of subject matter jurisdiction, and denied plaintiff's motions as moot.
STANDARD OF REVIEW	De novo review of the magistrate judge's findings and recommendations under 28 U.S.C. § 636(b)(1)(C).
PRECEDENTIAL VALUE	Unpublished district court order; precedential status is not stated in the opinion.
PARTIES	Eric Davon Davis v. Neil Shepard, Jaya Badiga, Sacramento Department of Child Support, El Dorado County Auditor-Controller's Office

TOPICS

subject matter jurisdiction

default judgment

injunctions

family law

civil procedure

PRACTICE AREAS

civil procedure

family law

remedies

QUESTIONS PRESENTED

1. Whether the complaint challenging enforcement of state child-support orders was barred by the Rooker-Feldman doctrine and the domestic-relations exception.
2. Whether the court could enter default judgment when it lacked subject matter jurisdiction.
3. Whether plaintiff's disagreement with the magistrate judge's rulings established judicial bias.
4. Whether the magistrate judge's findings and recommendations should be adopted after de novo review.

HOLDINGS

1. The claims were barred because they sought to challenge a state-court order requiring plaintiff to make child-support payments; the court therefore lacked subject matter jurisdiction.
2. The claims against Commissioner Shepard and Judge Badiga were barred by judicial immunity.
3. A court cannot enter a valid default judgment when it lacks subject matter jurisdiction, so denial of plaintiff's motion for default judgment as moot was proper.
4. Disagreement with the court's rulings does not establish bias; an assertion of bias must be based on an extrajudicial source.

KEY QUOTATIONS

"a court cannot enter a valid default judgment against a defendant when it lacks subject matter jurisdiction"
(at 2)

"Disagreements with the [c]ourt's rulings do not support [] assertions of bias ... because assertions of bias must be predicated upon an extrajudicial source." (at 2)

FACTUAL BACKGROUND

Plaintiff challenged the enforcement of state-court child-support orders against him, naming a commissioner, a state judge, a child-support agency, and a county office as defendants. He sought a preliminary injunction preventing enforcement of the orders and later sought default judgment. The magistrate judge concluded that the claims were barred by the Rooker-Feldman doctrine and the domestic-relations exception, and that claims against the commissioner and judge were also barred by judicial immunity.

PROCEDURAL HISTORY

Plaintiff filed a civil action challenging enforcement of state child-support orders and later moved for a preliminary injunction and default judgment. The magistrate judge recommended dismissal without leave to

amend under the Rooker-Feldman doctrine, the domestic-relations exception, and judicial immunity, and recommended denial of the motions as moot. After plaintiff objected, the district court reviewed the matter de novo, adopted the findings and recommendations in full, dismissed the complaint without prejudice, denied the pending motions as moot, and closed the case.

DISPOSITION

dismissed

CASES CITED

- Rooker v. Fidelity Trust Co., 263 U.S. 413 (1923)
- District of Columbia Court of Appeals v. Feldman, 460 U.S. 462 (1983)
- In re Tuli, 172 F.3d 707, 712 (9th Cir. 1999)
- Martinez v. Secretary of California Department of Corrections and Rehabilitation, No. 22-cv-01170-JLT-GSA, 2025 WL 572995, at *5 (E.D. Cal. Feb. 21, 2025)

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