

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA

Samuel Jackson and Einat Jackson v. Joseph Edlow, et al.

Jackson v. Edlow · No. 1:25-cv-00307 · Decided January 27, 2026

SUMMARY

The United States District Court for the Western District of Pennsylvania denies and dismisses pro se petitioners’ motion for a preliminary injunction and petition for a writ of mandamus seeking adjudication of an I-485 application and related immigration applications. The court concludes that the petitioners cannot show a clear nondiscretionary duty because the government’s evidence indicates that no application is pending and prior filings were approved, denied, administratively closed, or rejected.

CASE DETAILS

COURT	United States District Court for the Western District of Pennsylvania
JURISDICTION	United States District Court for the Western District of Pennsylvania
DECIDED	January 27, 2026
DOCKET	1:25-cv-00307
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petition for a writ of mandamus seeking to compel adjudication of an immigration application, together with a motion for preliminary injunction and expedited consideration.
STANDARD OF REVIEW	Preliminary injunctive relief requires the movant to show a likelihood of success on the merits, likely irreparable harm absent relief, that the balance of equities favors relief, and that an injunction is in the public interest. A mandamus petitioner must show a clear and indisputable right to relief, a clear duty on the part of the agency or official to act, and the absence of an adequate alternative remedy.
PRECEDENTIAL VALUE	unpublished memorandum order
PARTIES	Samuel Jackson, Einat Jackson v. Joseph Edlow, Kristi Noem, Pamela Bondi, Unnamed Field Office Director of USCIS, Buffalo Field Office, U.S. Citizenship and Immigration Services, U.S. Department of Homeland Security, U.S. Department of Justice

TOPICS

mandamus immigration

injunctions

immigration

administrative law

judicial review of agency action

PRACTICE AREAS

immigration

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civil procedure

remedies

QUESTIONS PRESENTED

1. Whether petitioners were entitled to a preliminary injunction compelling USCIS to adjudicate Einat Jackson's immigration applications.
2. Whether petitioners could obtain mandamus relief absent a pending application and a clear nondiscretionary duty owed by the respondents.

HOLDINGS

1. Petitioners were not entitled to a preliminary injunction because they could not establish a likelihood of success on the merits of their mandamus petition.
2. Mandamus relief was inappropriate because petitioners failed to identify a clear nondiscretionary duty owed by any respondent, and the absence of a pending application defeated the mandamus claim.

KEY QUOTATIONS

“A writ of mandamus is an extreme remedy that is invoked only in extraordinary situations.”

“In the absence of any pending application, there is no clearly nondiscretionary duty of any of the Respondents, mandamus relief is inappropriate here, and the petition must be dismissed.”

FACTUAL BACKGROUND

Samuel Jackson is a United States citizen, and Einat Jackson is a foreign national and his lawful spouse and caretaker. Petitioners alleged that USCIS had failed to lawfully and timely adjudicate Einat Jackson's Form I-485 application and sought an order compelling adjudication of her pending immigration applications. The Government submitted evidence that she had no application pending with USCIS and that her filings had already been approved, denied, administratively closed, or rejected.

PROCEDURAL HISTORY

Petitioners filed a mandamus action alleging that USCIS had failed to timely adjudicate Einat Jackson's Form I-485 application and related applications. They then moved for a preliminary injunction. Although the Government had not been served, it filed an opposition supported by evidence that no application was pending and that all of Jackson's filings had been approved, denied, administratively closed, or rejected. The court denied the requested preliminary injunction and dismissed the mandamus petition.

DISPOSITION

dismissed

CASES CITED

- SEC v. Chappell, 107 F.4th 114, 126 (3d Cir. 2024)
- Ferring Pharmaceuticals, Inc. v. Watson Pharmaceuticals, Inc., 765 F.3d 205, 210 (3d Cir. 2014)
- Winter v. Natural Resources Defense Council, Inc., 555 U.S. 7, 20 (2008)
- Greater Philadelphia Chamber of Commerce v. City of Philadelphia, 949 F.3d 116, 133 (3d Cir. 2020)
- In re Zimmerman, 739 F. App'x 101, 103 (3d Cir. 2018)
- Kerr v. United States District Court, 426 U.S. 394, 402 (1976)
- Haines v. Liggett Group Inc., 975 F.2d 81, 89 (3d Cir. 1992)
- Talbert v. Biden, 2024 WL 3445749, at *4 (W.D. Pa. Apr. 11, 2024)
- Temple University Hospital, Inc. v. Secretary United States Department of Health & Human Services, 2 F.4th 121, 132 (3d Cir. 2021)
- Heckler v. Ringer, 466 U.S. 602, 616 (1984)

OPINION

EDLOW

PER CURIAM.

IN THE UNITED STATES DISTRICT COURT

FOR THE WESTERN DISTRICT OF PENNSYLVANIA

SAMUEL JACKSON and)

EINAT JACKSON,)

Petitioners,) V. Case No. 1:25-CV-307 JOSEPH EDLOW, et al, Respondents.

MEMORANDUM ORDER

Petitioners Samuel and Einat Jackson, a married couple acting pro se, initiated this action by filing a petition for writ of mandamus. Samuel Jackson is a citizen of the United States and Einat Jackson is a foreign national and the lawful spouse and caretaker of Samuel. Petitioners allege that Respondents have failed to lawfully and timely adjudicate her I-485 application. As Respondents to this action, Petitioners have named Joseph Edlow, Director of U.S. Citizenship and Immigration Services (USCIS); Kristi Noem, Secretary of the Department of Homeland Security; Pamela Bondi, the Attorney General of the United States; the unnamed Field Office Director of USCIS, Buffalo Field Office; USCIS; U.S. Department of Homeland Security; and the U.S. Department of Justice. As relief in the petition, Petitioners seek the issuance of a “writ of mandamus compelling USCIS to adjudicate without further delay all pending applications of Petitioner Einat Jackson including her application for lawful permanent residence (green card) and employment authorization.” ECF No. 3, p. 3. Shortly after the filing of the petition, Petitioners filed a motion for preliminary injunction and expedited consideration. In their motion for preliminary injunction,

Petitioners seek relief similar to that listed in the petition and request that this Court do so in an expedited manner . ECF No. 5. The Government, although it has not been served, has filed a response in opposition to the motion for preliminary injunction. ECF No. 11. Every motion for preliminary injunction is judged the same way. Preliminary injunctive relief “is an extraordinary remedy, which should be granted only in limited circumstances.” *Securities & Exchange Commission v. Chappell*, 107 F.4TM 114, 126 (3d Cir. 2024) quoting *Ferring Pharms., Inc. v. Watson Pharms., Inc.*, 765 F.3d 205, 210 (3d Cir. 2014). Any party seeking a preliminary injunction “must establish that [it] is likely to succeed on the merits, that [it] is likely to suffer irreparable harm in the absence of preliminary relief, that the balance of equities tips in [its] favor, and that an injunction is in the public interest.” *Id.* quoting *Winter v. Nat. Res. Defense Counsel, Inc.*, 555 U.S. 7, 20 (2008). “Generally, the moving party must establish the first two factors and only if these gateway factors are established does the district court consider the remaining two factors.” *Id.* quoting *Greater Phil. Chamber of Comm. v. City of Phil*, 949 F.3d 116, 133 (3d Cir. 2020). Once both of “the gateway factors are met, the court then determines in its sound discretion if all four factors, taken together, balance in favor of granting the requested preliminary relief.” *Id.* Here, Petitioners’ request for a preliminary injunction must be denied because they have not, and cannot, establish that they are likely to succeed on the merits of their mandamus petition. A writ of mandamus is an extreme remedy that is invoked only in extraordinary situations. *In re Zimmerman*, 739 Fed. App’x 101, 103 (3d Cir. 2018) citing *Kerr v. United States Dist. Court*, 426 U.S. 394, 402 (1976). “In order to justify the use of this extraordinary remedy, a petitioner must show, among other things, a clear and indisputable right to the writ.” *Id.* citing *Haines v. Liggett Group Inc.*, 975 F.2d 81, 89 (3d Cir. 1992), For a mandamus to issue, “a litigant must satisfy three requirements that courts have characterized as jurisdictional: (1) a clear and indisputable right to relief, (2) that the government agency or official is violating a clear duty to act, and (3) that no adequate alternative remedy exists.” *Talbert v. Biden*, 2024 WL 3445749, at *4 (W.D. Pa. Apr. 11, 2024) quoting *Temple Univ. Hosp., Inc. v. Sec’y United States Dep’t of Health & Hum. Servs.*, 2 F.4th 121, 132 (3d Cir. 2021) (citing source omitted). The present request for mandamus fails at the outset. Petitioners have failed to identify any “clear nondiscretionary duty” owed to them by any of the Respondents. *Heckler v. Ringer*, 466 U.S. 602, 616 (1984). The Government has provided evidence that Ms. Jackson has no application pending with USCIS. ECF No. 11-1, P 30 (Declaration of N. Cycyk, Senior Immigration Services Officer). Moreover, all of Ms. Jackson’s filings have been either approved, denied, administratively closed, or rejected. /d. Petitioners have provided no evidence or argument to the contrary. In the absence of any pending application, there is no clearly nondiscretionary duty of any of the Respondents, mandamus relief is inappropriate here, and the petition must be dismissed. Likewise, the motion for preliminary injunction must also be dismissed. An appropriate Order follows.

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