

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Chaka E. v. Commissioner of Social Security

No. 24-8132 (KMW) (D.N.J. Jan. 2026) · No. No. 24-8132 (KMW) · Decided January 22, 2026

SUMMARY

The United States District Court for the District of New Jersey denies Plaintiff Chaka K.’s motion for a temporary restraining order seeking to enjoin a pending New Jersey state-court eviction proceeding. The Court holds that the Anti-Injunction Act bars the requested relief and that none of the Act’s exceptions applies. The Court notes that Plaintiff may pursue relief through the New Jersey state appellate process and reserves decision on other pending motions.

CASE DETAILS

COURT	United States District Court for the District of New Jersey
WRITING FOR THE COURT	Karen M. Williams
JURISDICTION	United States District Court for the District of New Jersey
DECIDED	January 22, 2026
DOCKET	No. 24-8132 (KMW)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for a temporary restraining order enjoining a scheduled New Jersey state-court eviction trial. The district court denied the motion under the Anti-Injunction Act.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Chaka E. v. Commissioner of Social Security

TOPICS

- injunctions
- eviction
- landlord tenant
- federalism
- civil procedure

PRACTICE AREAS

- civil procedure
- federal courts
- social security

QUESTIONS PRESENTED

- Whether the federal district court could enjoin the pending New Jersey state-court eviction proceeding.
- Whether any exception to the Anti-Injunction Act authorized the requested injunction.

HOLDINGS

1. The Anti-Injunction Act bars the federal court from enjoining the state-court eviction proceeding.
2. No Anti-Injunction Act exception applied because Plaintiff neither identified an express congressional authorization nor demonstrated that the injunction was necessary to aid the federal court's jurisdiction or protect or effectuate a federal judgment.

KEY QUOTATIONS

*“Courts in the Third Circuit have consistently held that the Anti-Injunction Act precludes a federal court from enjoining state court eviction or foreclosure proceedings.” (*1)*

*“The Act’s three exceptions are ‘construed narrowly,’ and ‘[a]ny doubts as to the propriety of a federal injunction against state court proceedings should be resolved in favor of permitting the state courts to proceed in an orderly fashion to finally determine the controversy.’” (*1)*

FACTUAL BACKGROUND

Plaintiff was involved in eviction proceedings in New Jersey state court, with an eviction trial scheduled for January 26, 2026. He asserted that the state-court judge had arbitrarily denied his request for discovery. Plaintiff then asked the federal district court to enjoin the state-court eviction trial through a temporary restraining order.

PROCEDURAL HISTORY

Plaintiff sought federal injunctive relief based on the state-court judge's alleged arbitrary denial of discovery in eviction proceedings pending in the Superior Court of New Jersey, Atlantic County. The district court concluded that none of the Anti-Injunction Act's exceptions applied and denied the TRO, while reserving decision on other pending motions.

DISPOSITION

other

CASES CITED

- In re Prudential Insurance Co. of America Sales Practices Litigation, 314 F.3d 99, 103 (3d Cir. 2002)
- Funes Nunez v. Morgan Properties, LLC, No. 25-17084, 2025 WL 3485725, at *1 (D.N.J. Dec. 4, 2025)
- Wilson v. Ortega, No. 23-00349, 2024 WL 5186912, at *4 (D.N.J. Dec. 20, 2024)
- Liggon-Redding v. Generations, No. 14-3191, 2014 WL 2805097, at *2 (D.N.J. June 20, 2014)
- Rhett v. Division of Housing, Department of Community Affairs, No. 14-5055, 2014 WL 7051787, at *3 n.2 (D.N.J. Dec. 12, 2014)
- In re Diet Drugs, 282 F.3d 220, 233 (3d Cir. 2002)
- Allen Bello, No. 14-0760, 2016 WL 1670927, at *14 (D.N.J. Apr. 27, 2016), aff'd sub nom., 861 F.3d 433 (3d Cir. 2017)
- Middlebrook at Monmouth v. Liban, 419 F. App'x 284, 286 (3d Cir. 2011)

- Exxon Mobil Corp. v. Saudi Basic Industries Corp., 544 U.S. 280, 284 (2005)

OPINION

NOT FOR PUBLICATION UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY CAMDEN VICINAGE HONORABLE KAREN M. WILLIAMS CHAKA E., Plaintiff, No. 24-8132 (KMW) v. MEMORANDUM OPINION COMM. OF SOCIAL SECURITY, AND ORDER Defendant, THIS MATTER comes before the Court by way of Plaintiff Chaka K.'s ("Plaintiff") Motion for Temporary Restraining Order ("TRO") filed on January 21, 2026 (Dkt.

No. 32). WHEREAS, Plaintiff seeks a TRO from this Court enjoining his eviction trial in the Superior Court of New Jersey, Atlantic County, Law Division, Special Civil Part — Landlord/Tenant, which is scheduled for January 26, 2026 (*id.* at 1); and WHEREAS, Plaintiff's TRO is based on his assertion that the state court judge presiding over his eviction proceedings arbitrarily denied his request for discovery (*id.* at 3); and WHEREAS, the United States Court of Appeals for the Third Circuit has held that the Anti-Injunction Act "prohibits injunctions having the effect of staying proceedings in state courts except 'as expressly authorized by Act of Congress, or where necessary in aid of its jurisdiction, or to protect or effectuate its judgments.'" *In re Prudential Ins.*

Co. of Am. Sales Praes. Litig., 314 B3d 99, 103 (3d Cir. 2002) (quoting 28 U.S.C. § 2283), "Courts in the Third Circuit have consistently held that the Anti-Injunction Act precludes a federal court from enjoining state court eviction or foreclosure proceedings." | *Funes Nunez v. Morgan Props, LLC*, No. 25-17084, 2025 1 "The Act's three exceptions are 'construed narrowly,' and 'any doubts as to the propriety of a federal injunction against state court proceedings should be resolved in favor of permitting the state courts to proceed in an orderly" WL 3485725, at *1 (D.N.I.

Dec. 4, 2025); see also *Wilson v. Ortega*, No. 23-00349, 2024 WL 5186912, at *4 (D.N.J., Dec. 20, 2024) ("The Anti-Injunction Act precludes a federal court from enjoining state-court eviction or foreclosure proceedings."); *Liggon-Redding v. Generations*, No. 14-3191, 2014 WL 2805097, at *2 (D.N.J., June 20, 2014) ("Federal courts 'lack the authority to stay any state court proceedings, including Eviction Actions.'" (citations omitted); *Rhett v. Div. of Hous., Dep't of Cmty.*

Affs., No. 14-5055, 2014 WL 7051787, at *3 n.2 (D.N.J., Dec. 12, 2014) ("To the extent Plaintiff requests that this Court dismiss the eviction proceedings or order them transferred to this Court, the Anti-Injunction Act prohibits this Court from taking such action.")? CONSEQUENTLY, for all the foregoing reasons; and for good cause shown; IT IS on this' fol. day of January, 2026, hereby ORDERED as follows: (1) Plaintiff's Motion for TRO (Dkt.

No, 32) is DENIED; and (2) The Court reserves decision on all other pending motions, which will be decided in due course; and (3) The Clerk of the Court shall serve a copy of this Order upon Plaintiff by regular U.S. mail. fy M. WILLIAMS UNITED STATES DISTRICT JUDGE fashion to finally determine the controversy.” Funes Nunez, 2025 WL 3485725, al *1 (quoling In re Diet Drugs, 282 220, 233 3d Cir, 2002)).

Here, Plaintiff does not assert that his request for injunctive relief is necessary to aid in Court’s jurisdiction or protect or effectuate a judgment of this Court. (See generally TRO); see 28 U.S.C, § 2283, Nor does Plaintiff cite to an “Act of Congress” expressly authorizing this Court to enjoin the state court eviction proceeding, notwithstanding the provisions of 28 U.S.C. § 2283.

Accordingly, no exceptions to the Anti-Injunction Act apply here. See id, in re Prudential his. Co, of An. Sales Pracs. Litig., 314 R.3d at 103; 28 U.S.C, § 2283,? Although this Court cannot grant the relief Plaintiff seeks, Plaintiff retains “an available avenue of relief; to file an appeal with the Appellate Division of the Superior Court of New Jersey (and beyond).” Allen Bello, No, 14-0760, 2016 WL 1670927, at *14 (D.N.I.

Apr. 27, 2016), aff’d sub nom., 861 F.3d 433 (3d Cir. 2017); see also Middlebrook At Mommnouti v. Liban, 419 F. App’x 284, 286 Gd Cir. 2011) (noting “federal district courts do not have appellate jurisdiction over state courl decisions... They cannol review proceedings conducted by a state tribunal to determine it reached its result in accordance with law.”) (citing Exvorr Mobil Corp. v. Saudi Basic Indus.

Corp., 544 US. 280, 284 (2005); see also N.J. Ct. R. 2:2 (““Appealable Judgment and Determinations”).