

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

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NOT FOR PUBLICATION UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY CAMDEN VICINAGE HONORABLE KAREN M. WILLIAMS CHAKA E., Plaintiff, No. 24-8132 (KMW) v. MEMORANDUM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 E.'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 manner.'" WL 3485725, at *1 (D.N.J.

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").