

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WASHINGTON

Tremayne J. Reed v. State of Washington, et al.

Reed · No. C25-5687-KKE · Decided January 23, 2026

SUMMARY

The United States District Court for the Western District of Washington adopted a magistrate judge’s Report and Recommendation and dismissed Tremayne J. Reed’s 42 U.S.C. § 1983 action with prejudice. The court held that the complaint was an impermissible de facto appeal of a state-court restitution order barred by the Rooker-Feldman doctrine, resulting in a lack of subject matter jurisdiction under Federal Rule of Civil Procedure 12(h)(3).

CASE DETAILS

COURT	United States District Court for the Western District of Washington
WRITING FOR THE COURT	Kymberly K. Evanson
JURISDICTION	United States District Court for the Western District of Washington
DECIDED	January 23, 2026
DOCKET	C25-5687-KKE
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff brought a 42 U.S.C. § 1983 civil-rights action challenging a state-court restitution order. After a magistrate judge recommended dismissal with prejudice for lack of subject matter jurisdiction under Federal Rule of Civil Procedure 12(h)(3), the district court reviewed the recommendation and plaintiff's objections de novo and adopted the recommendation.
STANDARD OF REVIEW	De novo review of the complaint, the magistrate judge's Report and Recommendation, and the plaintiff's objections.
PRECEDENTIAL VALUE	unknown
PARTIES	Tremayne J. Reed v. State of Washington, et al.

TOPICS

- subject matter jurisdiction
- section 1983
- motions to dismiss
- civil rights
- civil procedure

PRACTICE AREAS

civil procedure

civil rights

constitutional law

QUESTIONS PRESENTED

1. Whether the district court had subject matter jurisdiction over Reed's § 1983 action challenging a state-court restitution order.
2. Whether the Rooker-Feldman doctrine barred the action as an impermissible de facto appeal from a state-court judgment.
3. Whether Reed's objections showed that his action concerned an independent access-to-courts injury rather than an attempt to obtain relief from the state-court judgment.

HOLDINGS

1. The district court lacked subject matter jurisdiction because Reed's complaint sought federal review or relief from a state-court decision.
2. The Rooker-Feldman doctrine is not limited to challenges to convictions or sentences; it also applies to a challenge to a state-court restitution order when the plaintiff seeks relief from that state-court decision.

KEY QUOTATIONS

“a “forbidden de facto appeal under Rooker-Feldman” because it “complains of a legal wrong allegedly committed by the state court, and seeks relief from the judgment of that court.”” (at 3)

“a state-court decision is not reviewable by lower federal courts.” (at 3)

“Plaintiff’s complaint (Dkt. No. 6) and this action are DISMISSED with prejudice under Federal Rule of Civil Procedure 12(h)(3) for lack of subject matter jurisdiction.” (at 3)

FACTUAL BACKGROUND

Reed's complaint challenged a restitution order and related legal financial obligations imposed in state court. The state trial court had remitted all non-restitution legal financial obligations, and Reed later filed a personal restraint petition in the Washington Court of Appeals, which rejected it. Reed sought federal relief under § 1983 against Washington state entities and officials, effectively asking the federal district court to review or invalidate the state-court decision.

PROCEDURAL HISTORY

Reed commenced the action on August 5, 2025, and was granted leave to proceed in forma pauperis. He filed a § 1983 complaint challenging restitution-related legal financial obligations and naming the State of Washington, the Washington Supreme Court and individual justices, and the Washington State Department of Corrections as defendants. Magistrate Judge Michelle L. Peterson ordered Reed to show cause why the case should not be dismissed under the Rooker-Feldman doctrine and later recommended dismissal with prejudice. The district court overruled Reed's objections, approved and adopted the Report and Recommendation, and dismissed the action with prejudice for lack of subject matter jurisdiction.

DISPOSITION

dismissed

CASES CITED

- Cooper v. Ramos, 704 F.3d 772, 777 (9th Cir. 2012)
- Hooper v. Brnovich, 56 F.4th 619, 624 (9th Cir. 2022)
- Skinner v. Switzer, 562 U.S. 521, 532 (2011)
- Arellano v. Blahnik, 16-cv-2412-CAB (MSB), 2019 WL 2710527 (S.D. Cal. June 28, 2019)

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