

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
CALIFORNIA

Benson v. Stackhouse

Benson · No. 3:24-cv-02428-BEN-DDL · Decided August 28, 2025

SUMMARY

The United States District Court for the Southern District of California dismissed Edward Hunter Benson’s federal claims against Judge Renee Stackhouse and the County of San Diego without prejudice. The court abstained under *Younger v. Harris* because ongoing state family-law proceedings implicated important state interests, provided an adequate forum for constitutional claims, and could be practically enjoined by the requested federal relief. The court denied all pending motions.

CASE DETAILS

COURT	United States District Court for the Southern District of California
WRITING FOR THE COURT	Roger T. Benitez
JURISDICTION	United States District Court for the Southern District of California
DECIDED	August 28, 2025
DOCKET	3:24-cv-02428-BEN-DDL
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff brought constitutional civil-rights claims under 42 U.S.C. § 1983 seeking damages, injunctive relief, and attorney's fees based on ongoing California family-court proceedings. The district court dismissed the complaint without prejudice under <i>Younger</i> abstention and denied all pending motions.
STANDARD OF REVIEW	The court applied the <i>Younger</i> abstention doctrine to determine whether abstention was appropriate; no appellate standard of review was stated.
PRECEDENTIAL VALUE	unpublished district-court opinion; nonprecedential
PARTIES	Edward Hunter Benson v. Judge Renee Stackhouse, County of San Diego

TOPICS

- civil procedure
- injunctions
- section 1983
- family law
- federalism

PRACTICE AREAS

civil procedure

constitutional law

civil rights

family law

federalism

QUESTIONS PRESENTED

1. Whether the district court should abstain under *Younger* because an ongoing state divorce and child-custody proceeding implicated important state interests, allowed constitutional claims to be raised, and would be practically enjoined by the requested federal injunctive relief.
2. Whether any *Younger* exception for bad faith, harassment, or unusual circumstances applied.

HOLDINGS

1. *Younger* abstention applied because the state divorce and child-custody proceeding was ongoing, implicated important state interests in enforcing state-court orders and judgments, provided an adequate forum for constitutional claims, and the requested federal injunctive relief would have the practical effect of enjoining the state proceeding.
2. No *Younger* exception applied because Plaintiff did not establish bad faith, harassment, or another unusual circumstance warranting equitable relief.

KEY QUOTATIONS

“Younger abstention is grounded in a “longstanding public policy against federal interference with state court proceedings.”” (at 1)

“Younger abstention is appropriate when the state proceedings: (1) are ongoing; (2) are quasi-criminal enforcement actions or involve a state’s interest in enforcing the orders and judgments of its courts; (3) implicate an important state interest; (4) allow litigants to raise federal constitutional challenges; and (5) when the federal action would have the practical effect of enjoining the state proceedings.” (at 2)

FACTUAL BACKGROUND

Plaintiff alleged that a California family-law judge and the County of San Diego violated his constitutional and statutory rights during ongoing divorce and child-custody proceedings. He sought monetary damages, injunctive relief, and attorney’s fees based on the perceived unfairness of the state-court proceedings and their outcome.

PROCEDURAL HISTORY

The federal action was filed while Plaintiff’s divorce and child-custody matter remained pending in the Superior Court of California for San Diego County. The district court concluded that the state proceeding satisfied the requirements for *Younger* abstention and dismissed the federal complaint without prejudice.

DISPOSITION

dismissed

CASES CITED

- *Younger v. Harris*, 401 U.S. 37, 43 (1971)
- *Herrera v. City of Palmdale*, 918 F.3d 1037, 1043 (9th Cir. 2019)
- *ReadyLink Healthcare, Inc. v. State Comp. Ins. Fund*, 754 F.3d 754, 759 (9th Cir. 2014)
- *Hoye v. City of Oakland*, 653 F.3d 835, 843 n.5 (9th Cir. 2011)
- *Seattle Pac. Univ. v. Ferguson*, 104 F.4th 50, 63 (9th Cir. 2024)
- *Yelp Inc. v. Paxton*, 137 F.4th 944, 951 (9th Cir. 2025)
- *Moore v. Sims*, 442 U.S. 415, 435 (1979)
- *Gilbertson v. Albright*, 381 F.3d 965 (9th Cir. 2004) (en banc)
- *Matrai v. Hiramoto*, No. 21-15084, 2021 U.S. App. LEXIS 33610, 2021 WL 5276021, at *2 (9th Cir. 2021)

OPINION

1 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT 9 SOUTHERN DISTRICT OF
CALIFORNIA 10 11 EDWARD HUNTER BENSON,) Case No.: 24-CV-02428-BEN-DDL) 12
Plaintiff,) ORDER DISMISSING WITHOUT 13 v.) PREJUDICE) 14 JUDGE RENEE
STACKHOUSE;) COUNY OF SAN DIEGO, 15) Defendant.) 16 17 I. INTRODUCTION 18
This case arises from an ongoing action in the Superior Court of California, 19 County of San
Diego, involving Superior Court Family Law Judge Renee Stackhouse and 20 the County of San
Diego.

Plaintiff alleges violations of his constitutional and statutory 21 rights during family court
proceedings. Plaintiff seeks monetary damages, injunctive 22 relief, and attorney’s fees because of
his perceived unfairness in the outcome of the 23 underlying case and the anguish this has caused
him.¹ This case is like other cases 24 Plaintiff has brought relating to the same factual
circumstances, *Benson v. Torres et al*, 25 3:24-cv-02424-BEN-DDL, and *Benson v. Powazek et al*,
3:24-cv-02436-BEN-DDL.² 26 27 1 *Benson v. Benson*, Case No. 23FL001293N.

2 Plaintiff’s claims for money damages are frivolous or fanciful and implausible. 28 1 II. LEGAL
STANDARD 2 *Younger* abstention is grounded in a “longstanding public policy against federal 3
interference with state court proceedings.” *Younger v. Harris*, 401 U.S. 37, 43 (1971). 4 Under
Younger, federal courts “[preserve] respect for state functions” such that the 5 national government
protects federal rights and interests in a way that will not “unduly 6 interfere with the legitimate
activities of the state[.]” *Id.* at 44.

Pursuant to *Younger*, a 7 federal court may, and usually should, abstain from hearing a case in
which a state civil 8 action is proceeding and where the federal action implicates a state’s interest
in enforcing 9 the orders and judgments of its courts. *Herrera v. City of Palmdale*, 918 F.3d 1037,
1043 10 (9th Cir. 2019) (citing *ReadyLink Healthcare, Inc. v. State Comp Ins.*

Fund, Hoyer v. City of Oakland, 653 F.3d 835, 843 n.5 (9th Cir. 2011) (citation omitted). 12 A “five-prong test” is used to determine “whether a civil case is Younger-eligible.” 13 Seattle Pac. Univ. v. Ferguson, 104 F.4th 50, 63 (9th Cir. 2024). Younger abstention is 14 appropriate when the state proceedings: (1) are ongoing; (2) are quasi-criminal 15 enforcement actions or involve a state’s interest in enforcing the orders and judgments of 16 its courts; (3) implicate an important state interest; (4) allow litigants to raise 17 federal constitutional challenges; and (5) when the federal action would have the practical 18 effect of enjoining the state proceedings.

Yelp Inc. v. Paxton, 137 F.4th 944, 951 (9th Cir. 2025) (quoting ReadyLink Healthcare, 754 F.3d at 759). 19 III. DISCUSSION 20 The Complaint asserts constitutional civil rights claims for compensatory damages, 22 punitive damages, injunctive relief, and attorneys’ fees under 42 U.S.C. § 1983. (ECF. 23 No. 1 at 21). 24 Plaintiff’s claims fall squarely within the bounds of the Younger abstention 25 26 27 3 There are exceptions for a “showing of bad faith, harassment, or any other unusual circumstance that would call for equitable relief,” and the exceptions are narrow.

Yelp, Inc., 137 F.4th at 951 (quoting 28 | doctrine. They are subject to the doctrine for the following reasons: (1) the divorce case 2 is ongoing in state court;* (2) the Plaintiff is seeking injunctive relief from a federal court 3 that would interfere with the enforcement of a state court order; (3) divorce and family 4 proceedings are considered important state interests; and (4) the state trial and 5 appellate courts provide an adequate forum to hear constitutional claims.

6 As to the fifth prong, the fifth prong is met when the requested relief seeks to 7 enjoin or has the practical effect of enjoining the ongoing state judicial proceedings. Yelp 8 Inc., 137 F.4th at 951. This federal action would have a practical effect of enjoining the? underlying state court proceeding because if injunctive relief were obtained, it would 10 || undermine the ongoing divorce and child custody case.

Indeed, that is precisely the 11 | effect the Plaintiff intends to achieve. Thus, the fifth prong is also easily met. Lastly, 12 none of the Younger exceptions apply here. 13 Therefore, this Court abstains from exercising jurisdiction over this case. Moore v. 14 Sims, 442 U.S. 415, 435 (1979) (district court should have abstained and dismissed where 15 | state court family relations case was proceeding); Gilbertson v. Albright, 381 F.3d 965, 16 (9th Cir.

2004) (en banc) (Younger principles counsel federal court abstention). 17 IV. CONCLUSION 18 The Complaint is hereby DISMISSED without prejudice. All pending motions are 19 || DENIED. 20 IT IS SO ORDERED. I, in, 21 || DATED: August 27, 2025 22 HON. ROGER T. BENITEZ 74 United States District Judge 24 25 |} 27 The date for determining whether Younger applies is the date the federal action is filed.” Matrai v. 28 Hiramoto, No. 21-15084, 2021 U.S. App.

LEXIS 33610, 2021 WL 5276021, at *2 (9th Cir. 2021) (quoting ReadyLink, 754 F.3d at 759 (quoting Gilberson, 381 F.3d at 969 n. 4 (en banc)) (cleaned up). 3.

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