

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Ryan v. Fuentes

Ryan · No. 2:25-cv-0925-DJC-JDP (PS) · Decided April 29, 2025

SUMMARY

The United States District Court for the Eastern District of California screened Natasha Ryan’s pro se complaint concerning a state-court child custody determination and claims against numerous defendants. The court held that it lacked jurisdiction over the custody-related claims under the domestic-relations exception and Rooker-Feldman doctrine, and identified additional defects involving state action, immunity, and joinder. The court granted in forma pauperis status, dismissed the complaint with leave to amend, and gave plaintiff thirty days to amend or voluntarily dismiss.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Jeremy D. Peterson
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	April 29, 2025
DOCKET	2:25-cv-0925-DJC-JDP (PS)
DISPOSITION	other
PROCEDURAL POSTURE	Screening order in a pro se civil-rights action filed against state and private defendants; the court granted in forma pauperis status and dismissed the complaint with leave to amend.
STANDARD OF REVIEW	Screening under 28 U.S.C. § 1915 and the pleading standards of Federal Rule of Civil Procedure 8(a)(2); the court accepted well-pleaded factual allegations but disregarded conclusory legal assertions and assessed whether the complaint stated a plausible claim.
PRECEDENTIAL VALUE	nonprecedential

TOPICS

- subject matter jurisdiction
- child custody
- section 1983
- joinder
- pleadings

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the federal district court had subject-matter jurisdiction over claims seeking to invalidate or otherwise challenge a state-court child-custody determination.
2. Whether the complaint stated claims under 42 U.S.C. § 1983 against private parties, judicial and quasi-judicial actors, an attorney, and other defendants.
3. Whether the complaint improperly joined unrelated claims and defendants in violation of Federal Rule of Civil Procedure 20.
4. Whether the complaint should be dismissed with leave to amend rather than dismissed with prejudice at the screening stage.

HOLDINGS

1. The federal district court lacks jurisdiction to adjudicate child-custody claims because custody disputes are matters of domestic relations governed primarily by state law.
2. A federal district court lacks subject-matter jurisdiction over a forbidden de facto appeal from a state-court custody judgment and over issues inextricably intertwined with that judgment.
3. A § 1983 defendant must have acted under color of state law, meaning the defendant exercised power possessed by virtue of state law and made possible by authority of state law.
4. Judges are absolutely immune from damages liability for judicial acts; mediators have quasi-judicial immunity for conduct within the scope of their authority; and criminal defense attorneys generally do not act under color of state law when handling criminal cases.
5. A plaintiff may not join unrelated claims against unrelated defendants in one action under Federal Rule of Civil Procedure 20.

KEY QUOTATIONS

“At its core, plaintiff’s complaint is about her losing custody of her children.” (at 2)

“This court does not have jurisdiction over child custody claims, which are exclusively matters of state law.”
(at 3)

“Plaintiff asks this court to invalidate a state court decision granting custody of her children to her children’s father, defendant Contreras—a type of review that Rooker-Feldman squarely prohibits.” (at 4)

“Under Rule 20 of the Federal Rules of Civil Procedure, a plaintiff cannot bring unrelated claims against different defendants.” (at 6)

FACTUAL BACKGROUND

Ryan's complaint challenged the loss of custody of her children after a March 2025 custody hearing in Stanislaus Superior Court. She alleged that she was unable to participate in the hearing because it was conducted online and she experienced technical difficulties. She also asserted claims against the children's father and his girlfriend, a

judge, a mediator, an attorney, school-district and police employees, and a county agency based on various unrelated events.

PROCEDURAL HISTORY

Natasha Ryan filed a complaint alleging grievances arising primarily from a state-court child-custody proceeding and naming numerous defendants. The district court screened the complaint, concluded that it lacked subject-matter jurisdiction over the custody-related claims and identified additional pleading, state-action, immunity, and joinder defects. The court dismissed the complaint with leave to amend and allowed thirty days for an amended complaint or voluntary dismissal.

DISPOSITION

other

CASES CITED

- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)
- Kobold v. Good Samaritan Regional Medical Center, 832 F.3d 1024, 1038 (9th Cir. 2016)
- Nagrampa v. MailCoups, Inc., 469 F.3d 1257, 1264 n.2 (9th Cir. 2006) (en banc)
- Haines v. Kerner, 404 U.S. 519, 520 (1972) (per curiam)
- Hayes v. Idaho Correctional Center, 849 F.3d 1204, 1208 (9th Cir. 2017)
- Bruns v. National Credit Union Administration, 122 F.3d 1251, 1257 (9th Cir. 1997)
- Ivey v. Board of Regents, 673 F.2d 266, 268 (9th Cir. 1982)
- Ankenbrandt v. Richards, 504 U.S. 689, 702-04 (1992)
- Peterson v. Babbitt, 708 F.2d 465, 466 (9th Cir. 1983)
- Thompson v. Thompson, 798 F.2d 1547, 1558 (9th Cir. 1986)
- Worldwide Church of God v. McNair, 805 F.2d 888, 890 (9th Cir. 1986)
- Exxon Mobil Corp. v. Saudi Basic Industries Corp., 544 U.S. 280, 283-84 (2005)
- District of Columbia Court of Appeals v. Feldman, 460 U.S. 462, 476 (1983)
- Rooker v. Fidelity Trust Co., 263 U.S. 413, 415 (1923)
- Noel v. Hall, 341 F.3d 1148, 1156, 1158, 1163 (9th Cir. 2003)
- Bell v. City of Boise, 709 F.3d 890, 897 (9th Cir. 2013)
- In re Gruntz, 202 F.3d 1074, 1079 (9th Cir. 2000)
- Moore v. County of Butte, 547 F. App'x 826, 829 (9th Cir. 2013)
- Riley v. Knowles, No. 1:16-CV-0057-JLT, 2016 WL 259336, at *3 (E.D. Cal. Jan. 21, 2016)
- Davis v. California Department of Child Services, No. 2:20-cv-01393-TLN-AC (PS), 2020 WL 5039243, at *2 (E.D. Cal. Aug. 26, 2020)
- West v. Atkins, 487 U.S. 42, 49 (1988)

- United States v. Classic, 313 U.S. 299, 326 (1941)
- Mullis v. U.S. Bankruptcy Court for the District of Nevada, 828 F.2d 1385, 1388 (9th Cir. 1987)
- Sacks v. Dietrich, 663 F.3d 1065 (9th Cir. 2011)
- Davenport v. Winley, 314 F. App'x 982 (9th Cir. 2009)
- Secress v. Ullman, 147 F. App'x 636, 638 (9th Cir. 2005)
- Polk County v. Dodson, 454 U.S. 312, 325 (1981)
- Briley v. California, 564 F.2d 849, 855 (9th Cir. 1977)
- George v. Smith, 507 F.3d 605, 607 (7th Cir. 2007)
- Lacey v. Maricopa County, 693 F.3d 896, 907 n.1 (9th Cir. 2012) (en banc)