

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
LOUISIANA

Hiran Rodriguez v. Meta Platforms, Inc., et al.

Rodriguez · No. 2:25-cv-00197 · Decided April 6, 2026

SUMMARY

The United States District Court for the Eastern District of Louisiana denied Hiran Rodriguez’s emergency motion for relief from judgment under Federal Rule of Civil Procedure 60(d)(3) and Rule 60(b)(6). The court held that restrictions on Rodriguez’s filings, the refusal to docket a recusal motion, and the entry of final judgment while motions were pending did not establish fraud on the court or extraordinary circumstances warranting reopening the judgment.

CASE DETAILS

COURT	United States District Court for the Eastern District of Louisiana
WRITING FOR THE COURT	Jay C. Zainey
JURISDICTION	United States District Court for the Eastern District of Louisiana
DECIDED	April 6, 2026
DOCKET	2:25-cv-00197
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for relief from a final judgment under Federal Rule of Civil Procedure 60(d)(3), or alternatively Rule 60(b)(6), seeking to vacate the judgment and reassign the case.
STANDARD OF REVIEW	Relief under Rule 60(d)(3) is limited to fraud on the court, and relief under Rule 60(b)(6) requires extraordinary circumstances justifying reopening a final judgment.
PRECEDENTIAL VALUE	Unpublished district court order; precedential status unknown.
PARTIES	Hiran Rodriguez v. Meta Platforms, Inc., et al.

TOPICS

- motion for reconsideration
- civil procedure
- remedies
- appellate procedure
- final judgment rule

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the district court's restrictions on Rodriguez's filings and the refusal to docket his recusal motion constituted fraud on the court warranting relief under Federal Rule of Civil Procedure 60(d)(3).
2. Whether the district court's entry of final judgment while motions remained pending, and its filing requirements, constituted extraordinary circumstances warranting relief under Federal Rule of Civil Procedure 60(b)(6).

HOLDINGS

1. The alleged conduct did not constitute fraud on the court because Rodriguez failed to allege sufficient facts showing the egregious misconduct required for relief under Rule 60(d)(3).
2. Relief under Rule 60(b)(6) was unwarranted because Rodriguez failed to show extraordinary circumstances justifying reopening the final judgment.

KEY QUOTATIONS

“Relief under Rule 60(d)(3) of the Federal Rules of Civil Procedure allows the court to “set aside a judgment for fraud on the court.””

“embrace only the species of fraud which does or attempts to, defile the court itself, or is a fraud perpetrated by officers of the court so that the judicial machinery cannot perform in the usual manner its impartial task of adjudging cases that are presented for adjudication.” (873 F.2d at 872)

“to show ‘extraordinary circumstances’ justifying the reopening of a final judgment.” (731 F.3d at 374)

FACTUAL BACKGROUND

Rodriguez proceeded pro se and in forma pauperis and asserted 15 causes of action against 26 defendants, seeking more than \$50 billion in compensatory damages and \$100 billion in punitive damages. The district court entered an order restricting him from filing motions until he filed an amended complaint, and the Clerk's Office refused to docket a recusal motion under that order. The court subsequently dismissed the action as frivolous and for failure to state a claim and entered final judgment.

PROCEDURAL HISTORY

Rodriguez filed the action pro se and in forma pauperis on January 29, 2025. The district court restricted further motion filings until he filed an amended complaint, and the Clerk's Office declined to docket his recusal motion under that order. On May 22, 2025, the court dismissed the claims as frivolous and for failure to state a claim and entered final judgment. The Fifth Circuit later dismissed Rodriguez's appeal for want of prosecution. Rodriguez then sought relief from the judgment, which the district court denied.

DISPOSITION

other

CASES CITED

- Rodriguez v. Meta Platforms, No. CV 25-30493, ECF No. 22 (5th Cir. Dec. 4, 2025)
- Wilson v. Johns-Manville Sales Corp., 873 F.2d 869, 872 (5th Cir. 1989)
- Kerwit Medical Products, Inc. v. N & H Instruments, Inc., 616 F.2d 833, 837 (5th Cir. 1980)
- Curtis v. Brunsting, 860 Fed. Appx. 332, 336 (5th Cir. 2021)
- Rozier v. Ford Motor Co., 573 F.2d 1332, 1338 (5th Cir. 1978)
- Booker v. Dugger, 825 F.2d 281, 283-84 (11th Cir. 1987)
- Diaz v. Stephens, 731 F.3d 370, 374 (5th Cir. 2013)
- Gonzalez v. Crosby, 545 U.S. 524, 535 (2005)

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