

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MAINE

Justin Tahai v. Valerie Stanfill et al.

Tahai · No. 2:26-cv-00057-LEW · Decided April 15, 2026

SUMMARY

A United States magistrate judge recommends dismissing Justin Tahai’s in forma pauperis complaint, which sought declaratory and injunctive relief concerning delays in an ongoing Maine child-custody proceeding. The recommendation concludes that Younger abstention applies because the state proceeding is ongoing, implicates important state interests in family relations and child protection, and provides an adequate opportunity to present federal constitutional claims. The court also recommends that any pending motions be denied as moot.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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| COURT                 | United States District Court for the District of Maine                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| WRITING FOR THE COURT | Karen Frink Wolf                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| JURISDICTION          | United States District Court for the District of Maine                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| DECIDED               | April 15, 2026                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| DOCKET                | 2:26-cv-00057-LEW                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| DISPOSITION           | dismissed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| PROCEDURAL POSTURE    | After granting Plaintiff leave to proceed in forma pauperis, the magistrate judge conducted preliminary review of the complaint under 28 U.S.C. § 1915(e)(2)(B) and issued a recommended decision that the complaint be dismissed and pending motions be denied as moot.                                                                                                                                                                                                                                                                                             |
| STANDARD OF REVIEW    | Under 28 U.S.C. § 1915(e)(2)(B), the court must dismiss an in forma pauperis action that is frivolous, malicious, fails to state a claim, or seeks monetary relief from an immune defendant. In evaluating whether a complaint states a claim, the court accepts well-pleaded facts as true, draws reasonable inferences for the plaintiff, and liberally construes a pro se complaint while requiring sufficient factual detail to provide fair notice. The recommended decision was subject to de novo review of timely objections under 28 U.S.C. § 636(b)(1)(B). |
| PRECEDENTIAL VALUE    | nonprecedential                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

TOPICS

civil procedure

family law procedure

injunctions

declaratory judgment

federalism

## PRACTICE AREAS

civil procedure

family law

constitutional law

federalism

remedies

## QUESTIONS PRESENTED

1. Whether the federal court should abstain under *Younger v. Harris* from intervening in an ongoing state child-custody proceeding.
2. Whether the pending state proceeding implicated an important state interest and provided an adequate opportunity to present Tahai's federal constitutional claims.
3. Whether the complaint seeking only declaratory and injunctive relief should be dismissed under 28 U.S.C. § 1915(e)(2)(B).
4. Whether the federal court could direct the state court in the management of its docket or issue relief requiring expedited state-court proceedings.

## HOLDINGS

1. Younger abstention is appropriate when federal intervention would interfere with an ongoing state judicial proceeding, the proceeding implicates an important state interest, and the plaintiff has an adequate opportunity to present the federal constitutional challenge in the state proceeding.
2. A federal court may not direct a state court in the performance of its judicial duties or supervise the management of the state court's docket through injunctive or mandamus-like relief.
3. Because the action sought only declaratory and injunctive relief and Younger abstention applied, dismissal of the complaint was recommended rather than a stay.

## KEY QUOTATIONS

*“Abstention is appropriate when the requested relief would interfere (1) with an ongoing state judicial proceeding; (2) that implicates an important state interest; and (3) that provides an adequate opportunity for the federal plaintiff to advance his federal constitutional challenge.”* (489 F.3d at 34-35)

*“no authority to issue such a writ to direct state courts or their judicial officers in the performance of their duties.”* (632 F.3d at 1292)

## FACTUAL BACKGROUND

Tahai alleged that he had been denied custody of his child for 417 days while a Maine state-court custody proceeding remained pending. He claimed that the delay infringed his fundamental parental right to direct the care and upbringing of his child. He sought a declaratory judgment that the delay violated the Fourteenth Amendment and preliminary and permanent injunctions requiring procedural safeguards and directing the state court to expedite its proceedings. His complaint and emergency motion showed that the state trial and appellate processes had not been exhausted.

## PROCEDURAL HISTORY

Tahai filed a federal complaint seeking declaratory and injunctive relief concerning the alleged delay in an ongoing Maine state child-custody proceeding. The federal court granted his application to proceed in forma pauperis. On preliminary review, the magistrate judge recommended dismissal under the in forma pauperis screening statute based on Younger abstention and recommended that other pending motions be denied as moot, subject to objections and de novo review by the district court.

## DISPOSITION

dismissed

## CASES CITED

- Neitzke v. Williams, 490 U.S. 319, 324 (1989)
- Ocasio-Hernández v. Fortuño-Burset, 640 F.3d 1, 12 (1st Cir. 2011)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- Donovan v. Maine, 276 F.3d 87, 94 (1st Cir. 2002)
- Byrne v. Maryland, No. 1:20-cv-00036-GZS, 2020 WL 1317731, at \*5 (D. Me. Mar. 20, 2020), aff'd, 2020 WL 2202441 (D. Me. May 6, 2020)
- Younger v. Harris, 401 U.S. 37 (1971)
- Moore v. Sims, 442 U.S. 415, 423, 435 (1979)
- Malachowski v. City of Keene, 787 F.2d 704, 708 (1st Cir. 1986)
- Rossi v. Gemma, 489 F.3d 26, 34-35 (1st Cir. 2007)
- Robb v. Connolly, 111 U.S. 624, 637 (1884)
- SKS & Associates, Inc. v. Dart, 619 F.3d 674, 682 (7th Cir. 2010)
- Nass v. Maine Bd. of Licensure in Med., No. 1:23-cv-00321-LEW, 2024 WL 3520931, at \*9 (D. Me. July 24, 2024)
- Knox v. Bland, 632 F.3d 1290, 1292 (10th Cir. 2011)

## OPINION

TAHAI

PER CURIAM.

UNITED STATES DISTRICT COURT

DISTRICT OF MAINE

JUSTIN TAHAI, )

) Plaintiff ) ) v. ) No. 2:26-cv-00057-LEW ) VALERIE STANFILL et al., ) ) Defendants )

RECOMMENDED DECISION AFTER PRELIMINARY REVIEW

Because I granted Justin Tahai's application to proceed in forma pauperis, see Order (ECF No. 5), his complaint (ECF No. 1) is now before me for preliminary review in accordance with 28 U.S.C. § 1915(e)(2)(B). For the reasons that follow, I recommend that the Court dismiss the Plaintiff's

complaint. I. Legal Standard The federal in forma pauperis statute, 28 U.S.C. § 1915, is designed to ensure meaningful access to federal courts for persons unable to pay the costs of bringing an action. See *Neitzke v. Williams*, 490 U.S. 319, 324 (1989). When a party proceeds in forma pauperis, however, a court must “dismiss the case at any time if” it determines that the action “is frivolous or malicious[,] . . . fails to state a claim on which relief may be granted,” or “seeks monetary relief against a defendant who is immune from such relief.” 28 U.S.C. § 1915(e)(2)(B). Dismissals under section 1915 are often made on the court’s own initiative “prior to the issuance of process, so as to spare prospective defendants the inconvenience and expense of answering” meritless complaints. *Neitzke*, 490 U.S. at 324. When considering whether a complaint states a claim for which relief may be granted, the court must accept the truth of all well-pleaded facts and give the plaintiff the benefit of all reasonable inferences. See *Ocasio-Hernández v. Fortuño-Burset*, 640 F.3d 1, 12 (1st Cir. 2011). A complaint fails to state a claim when it does not plead “enough facts to state a claim to relief that is plausible on its face.” *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 570 (2007). An unrepresented plaintiff’s complaint must be read liberally in this regard, see *Donovan v. Maine*, 276 F.3d 87, 94 (1st Cir. 2002), but must still contain “the crucial detail of who, what, when, where, and how” in order to provide fair notice of what the claims are and the grounds upon which they rest, *Byrne v. Maryland*, No. 1:20-cv-00036-GZS, 2020 WL 1317731, at \*5 (D. Me. Mar. 20, 2020) (rec. dec.), *aff’d*, 2020 WL 2202441 (D. Me. May 6, 2020). II. Allegations In his complaint, Tahai alleges that he has been denied custody of his child for 417 days during the pendency of a state court case. Complaint (ECF No. 1) ¶¶ 8-10. He alleges that the delay in resolving that case has deprived him of his fundamental parental right to direct the care and upbringing of his child. *Id.* To remedy the delay, Tahai asks this Court to enter a declaratory judgment stating that the delay has violated his due process right guaranteed by the Fourteenth Amendment and to issue preliminary and permanent injunctions forcing the State Court to implement procedural safeguards to ensure the timely resolution of his case and others like it. *Id.* at 2. Tahai’s complaint and a subsequent emergency motion show that he has not exhausted the state trial and appellate process. See *id.*; Motion (ECF No. 9). III. Discussion Under *Younger v. Harris*, 401 U.S. 37 (1971), federal courts generally abstain from intervening in state court proceedings, including those involving custody of a minor child. See *Moore v. Sims*, 442 U.S. 415, 423 (1979) (“The *Younger* doctrine, which counsels federal-court abstention when there is a pending state proceeding, reflects a strong policy against federal intervention in state judicial processes in the absence of great and immediate irreparable injury to the federal plaintiff.”); *Malachowski v. City of Keene*, 787 F.2d 704, 708 (1st Cir. 1986) (“[W]e find that the district court’s abstention from asserting jurisdiction over appellants’ injunctive claims was fully justified.”). “Abstention is appropriate when the requested relief would interfere (1) with an ongoing state judicial proceeding; (2) that implicates an important state interest; and (3) that provides an adequate opportunity for the federal plaintiff to advance his federal constitutional challenge.” *Rossi v. Gemma*, 489 F.3d 26, 34-35 (1st Cir. 2007). Each element of the *Younger*

abstention analysis is satisfied here. First, there is an ongoing state proceeding as demonstrated in both the complaint and the subsequent “Emergency MOTION to Prevent Continuing Denial of Meaningful Access to the Courts.” Motion at 1. Second, Maine has a “compelling state interest” in protecting children, and “[f]amily relations are a traditional area of state concern.” Moore, 442 U.S. at 435. Finally, there is an appellate process—generally following a final judgment from the trial court—that safeguards the Plaintiff’s federal rights relevant to the case currently before the Court. See, e.g., 19-A M.R.S.A. § 1774 (providing for appeals from final orders under the Uniform Child Custody Jurisdiction and Enforcement Act); *id.* § 104 (providing for appeals from final orders involving Title 19-A of the Maine Statutes governing Domestic Relations); Robb v. Connolly, 111 U.S. 624, 637 (1884) (recognizing the concurrent jurisdiction of state courts to hear issues “arising under the constitution or laws of the United States, or involving rights dependent upon such constitution or laws”).<sup>1</sup> Applying the principles of comity and federalism, federal courts should not intervene to expedite state court proceedings.<sup>2</sup> See *SKS & Associates, Inc. v. Dart*, 619 F.3d 674, 682 (7th Cir. 2010) (declining to “supervise” state court proceedings). Accordingly, I recommend that the Court abstain from hearing this case and dismiss the complaint, as it seeks only declaratory and injunctive relief. Cf. *Nass v. Maine Bd. of Licensure in Med.*, 1:23-cv-00321-LEW, 2024 WL 3520931, at \*9 (D. Me. July 24, 2024) (“A court that abstains from exercising jurisdiction under *Younger* 1 Additionally, “[t]he burden is on the federal plaintiff to show that state procedural law bars presentation of his claims.” 17B Charles Alan Wright & Arthur R. Miller, *Federal Practice and Procedure* § 4252 (3d ed.). Tahai has not carried that burden here. 2 Tahai filed the “Emergency Motion” in this Court just over two months after submitting his complaint. Complaint (ECF No. 1); Motion (ECF No. 9). The motion confirms that the State Court proceeding is ongoing and asks this Court to prevent the State Court from rejecting his evidentiary filings and to require prompt judicial review. Motion at 3. This Court, however, cannot direct the State Court in the management of its docket, see *Knox v. Bland*, 632 F.3d 1290, 1292 (10th Cir. 2011) (rejecting petition for mandamus and stating the federal court had “no authority to issue such a writ to direct state courts or their judicial officers in the performance of their duties.” (cleaned up)), and *Younger* abstention should apply. See Moore, 442 U.S. at 435 (“Family relations are a traditional area of state concern . . . [federal courts] are unwilling to conclude that state processes are unequal to the task of accommodating the various interests and deciding the constitutional questions that may arise in child-welfare litigation.”). ordinarily dismisses the federal action. However, to the extent that the federal action includes a damages claim, a court ordinarily may only stay the action, rather than dismiss the action in its entirety.” (cleaned up)); see also Complaint ¶ 1 (“Plaintiff seeks prospective declaratory and injunctive relief . . . .”). IV. Conclusion For the foregoing reasons, I recommend that the Court DISMISS the Plaintiff’s complaint pursuant to 28 U.S.C. § 1915(e)(2)(B) and MOOT any other pending motions.

#### NOTICE

A party may file objections to those specified portions of a Magistrate Judge’s report or proposed

findings or recommended decisions entered pursuant to 28 U.S.C. § 636(b)(1)(B) for which de novo review by the District Court is sought, together with a supporting memorandum, within fourteen

(14) days after being served with a copy thereof. A responsive memorandum

shall be filed within fourteen (14) days after the filing of the objection. Failure to file a timely objection shall constitute a waiver of the right to de novo review by the District Court and to appeal the District Court's order. Dated: April 15, 2026 /s/ Karen Frink Wolf United States Magistrate Judge