

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

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PRECEDENTIAL VALUE	nonprecedential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)