

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Bondoc v. Blake

Bondoc · No. Civil Action No. 25-1416 (SLS) · Decided January 30, 2026

SUMMARY

The United States District Court for the District of Columbia dismissed Shannon A. Bondoc’s claims against James Blake, Jr. for lack of subject-matter jurisdiction. The court applied Younger abstention to claims seeking interference with ongoing Maryland family-court proceedings and the Rooker–Feldman doctrine to claims challenging existing state-court judgments. The court did not reach the defendant’s Rule 12(b)(6) arguments.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Sparkle L. Sooknanan
JURISDICTION	United States District Court for the District of Columbia
DECIDED	January 30, 2026
DOCKET	Civil Action No. 25-1416 (SLS)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendant moved to dismiss the amended complaint under Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6). The court granted the motion under Rule 12(b)(1) for lack of subject-matter jurisdiction and dismissed the action.
STANDARD OF REVIEW	On a Rule 12(b)(1) motion, the plaintiff bears the burden of demonstrating subject-matter jurisdiction. The court liberally construes the complaint and gives the plaintiff the benefit of reasonable inferences; pro se pleadings are construed liberally and held to less stringent standards than lawyer-drafted pleadings.
PRECEDENTIAL VALUE	Published memorandum opinion
PARTIES	Shannon A. Bondoc v. James Blake, Jr.

TOPICS

- subject matter jurisdiction
- family law procedure
- child custody
- child support
- federalism

PRACTICE AREAS

family law

civil procedure

federal jurisdiction

federalism

QUESTIONS PRESENTED

1. Whether the federal district court had subject-matter jurisdiction over claims seeking to stay or interfere with ongoing Maryland divorce and child-custody proceedings.
2. Whether the Rooker-Feldman doctrine barred federal district-court review of Maryland child-support, child-custody, and other state-court orders.
3. Whether the court needed to decide the Rule 12(b)(6) motion or the domestic-relations exception after concluding that subject-matter jurisdiction was lacking.

HOLDINGS

1. The court could not exercise jurisdiction over Bondoc's claims seeking to stay or otherwise interfere with ongoing Maryland divorce and child-custody proceedings because the proceedings fell within the category of state proceedings covered by *Younger* and satisfied the requirements of ongoing proceedings, important state interests, and an adequate opportunity to raise federal issues.
2. The Rooker-Feldman doctrine barred Bondoc's claims seeking federal review or invalidation of Maryland child-support, child-custody, and forfeiture orders because those claims complained of injuries caused by state-court judgments and invited the federal district court to review and reject those judgments.
3. Because the court dismissed for lack of subject-matter jurisdiction under *Younger* and *Rooker-Feldman*, it did not need to reach the Rule 12(b)(6) motion or decide whether the domestic-relations exception independently deprived the court of jurisdiction.

KEY QUOTATIONS

“*[F]undamentally, federal courts have no business interfering with child-custody proceedings in state court.*” (at 2)

“*Family relations are a traditional area of state concern.*” (at 4)

“*The Rooker–Feldman doctrine applies to cases “complaining of injuries caused by state-court judgments rendered before the district court proceedings commenced and inviting district court review and rejection of those judgments.”*” (at 5)

FACTUAL BACKGROUND

Bondoc and Blake share a child. Bondoc alleged that she had primary custody until 2012, when a court transferred custody to Blake, and she challenged a \$34,046 child-support judgment and prior custody orders. She also sought to stay ongoing Maryland proceedings and obtain a change in custody or renewed federal visitation protections. The Maryland proceedings included ongoing divorce and child-custody litigation in Charles County.

PROCEDURAL HISTORY

Bondoc filed an action challenging Maryland child-support, child-custody, and related state-court orders and seeking to stay ongoing Maryland family-court proceedings. Blake moved to dismiss for lack of subject-matter jurisdiction and failure to state a claim. The motion was fully briefed; the court dismissed the case under Rule 12(b)(1), denied Bondoc's motion to strike as moot, and did not reach the Rule 12(b)(6) arguments.

DISPOSITION

dismissed

CASES CITED

- Hill v. U.S. Department of the Interior, 699 F. Supp. 3d 1, 12 (D.D.C. 2023)
- Lujan v. Defenders of Wildlife, 504 U.S. 555, 561 (1992)
- U.S. Ecology, Inc. v. U.S. Department of the Interior, 231 F.3d 20, 24 (D.C. Cir. 2000)
- Thomas v. Principi, 394 F.3d 970, 972 (D.C. Cir. 2005)
- Barr v. Clinton, 370 F.3d 1196, 1199 (D.C. Cir. 2004)
- Tyson v. Brennan, 277 F. Supp. 3d 28, 35 (D.D.C. 2017)
- Erickson v. Pardus, 551 U.S. 89, 94 (2007) (per curiam)
- Younger v. Harris, 401 U.S. 37, 44-45 (1971)
- Sprint Communications, Inc. v. Jacobs, 571 U.S. 69, 78 (2013)
- New Orleans Public Service, Inc. v. Council of the City of New Orleans, 491 U.S. 350, 368 (1989)
- Moore v. Sims, 442 U.S. 415, 435 (1979)
- Nellom v. Ambrose, No. 22-cv-1283, 2022 WL 4120265, at *1-*2 (E.D. Pa. Sept. 9, 2022)
- Smith v. Harrison, No. 21-cv-5120, 2022 WL 445757, at *4 (E.D. Pa. Feb. 14, 2022)
- Hoai v. Sun Refining & Marketing Co., 866 F.2d 1515, 1518 (D.C. Cir. 1989)
- Middlesex County Ethics Committee v. Garden State Bar Association, 457 U.S. 423, 432 (1982)
- Proctor v. Title 4-D, 318 F. Supp. 3d 337, 346 (D.D.C. 2018)
- Whitehead v. D.C. Child Support Services Division, 892 F. Supp. 2d 315, 318 (D.D.C. 2012)
- Delaney v. District of Columbia, 659 F. Supp. 2d 185, 194 (D.D.C. 2009)
- Pennzoil Co. v. Texaco, Inc., 481 U.S. 1, 15 (1987)
- Ankenbrandt v. Richards, 504 U.S. 689, 704 (1992)
- District of Columbia Court of Appeals v. Feldman, 460 U.S. 462 (1983)
- Rooker v. Fidelity Trust Co., 263 U.S. 413 (1923)
- Exxon Mobil Corp. v. Saudi Basic Industries Corp., 544 U.S. 280, 284 (2005)
- Richardson v. District of Columbia Court of Appeals, 83 F.3d 1513, 1514 (D.C. Cir. 1996)
- Hickson v. Newell, No. 24-cv-3576, 2025 WL 315144, at *1 (D.D.C. Jan. 28, 2025)
- Beasley v. Becker, No. 24-cv-2832, 2024 WL 5008723, at *1 (D.D.C. Nov. 27, 2024)
- Glass v. U.S. Department of Health & Human Services, No. 17-cv-428, 2017 WL 5479442, at *5 (D.D.C. Nov. 14, 2017)

- **Bennett v. Bennett**, 682 F.2d 1039, 1042 (D.C. Cir. 1982)

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