

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WASHINGTON

Linda Cook v. Ben Hosseinzadeh et al.

No. 2:25-cv-02013-JHC, United States District Court for the Western District of Washington (January 16, 2026)

SUMMARY

The United States District Court for the Western District of Washington denied Linda Cook’s motion for reconsideration of orders denying judicial recusal. The court held that the motion was untimely under Local Civil Rule 7(h) and, alternatively, failed to show manifest error, new facts, or a basis for disqualification under 28 U.S.C. § 455(b)(4).

CASE DETAILS

COURT	United States District Court for the Western District of Washington
WRITING FOR THE COURT	David G. Estudillo
JURISDICTION	United States District Court for the Western District of Washington
DECIDED	January 16, 2026
DOCKET	2:25-cv-02013-JHC
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for reconsideration of orders denying or affirming the denial of her motion to recuse District Judge John H. Chun. The court denied reconsideration.
STANDARD OF REVIEW	Reconsideration is ordinarily denied absent manifest error or new facts or legal authority that could not previously have been presented with reasonable diligence. The court also applied the fourteen-day filing requirement under LCR 7(h)(2).
PRECEDENTIAL VALUE	unknown
PARTIES	Linda Cook v. Ben Hosseinzadeh et al.

TOPICS

- motion for reconsideration
- civil procedure
- due process

PRACTICE AREAS

- civil procedure
- constitutional law
- judicial disqualification

QUESTIONS PRESENTED

1. Whether Plaintiff's motion for reconsideration should be granted under the Western District of Washington's standard requiring manifest error or newly available facts or legal authority.
2. Whether the motion should be denied as untimely under LCR 7(h)(2).
3. Whether the alleged irregularities in Judge Chun's nomination or subsequent docket-management decisions required recusal under 28 U.S.C. § 455(b)(4).

HOLDINGS

1. A motion for reconsideration filed more than fourteen days after the order to which it relates is untimely and may be denied on that ground.
2. Reconsideration is ordinarily unavailable absent manifest error in the prior ruling or new facts or legal authority that could not have been presented earlier with reasonable diligence; mere disagreement with the prior order is insufficient.
3. Section 455(b)(4) did not require recusal because Plaintiff failed to present clear evidence that Judge Chun's nomination was irregular.
4. The failure to decide a pending motion before another motion was filed and the renoting of a motion, without more, did not establish bias or support recusal.

KEY QUOTATIONS

“Motions for reconsideration are disfavored. The court will ordinarily deny such motions in the absence of a showing of manifest error in the prior ruling or a showing of new facts or legal authority which could not have been brought to its attention earlier with reasonable diligence.” (at 1)

“Accordingly, having reviewed the motion for reconsideration and the remainder of the record, the Court hereby DENIES Plaintiff’s motion for reconsideration.” (at 2)

FACTUAL BACKGROUND

Plaintiff challenged the validity of Judge Chun's judicial nomination and argued that the alleged irregularities required recusal under 28 U.S.C. § 455(b)(4). She also identified later docket-management events, including the timing of rulings and the renoting of a motion, as purported evidence of bias. The court found no clear evidence that Judge Chun's nomination was irregular and no basis to infer bias from the cited procedural events.

PROCEDURAL HISTORY

Judge Chun denied Plaintiff's motion for recusal on November 24, 2025. The court subsequently affirmed that denial on December 1, 2025. Plaintiff filed the present motion for reconsideration on December 29, 2025, which the court denied as untimely and, alternatively, on the merits.

DISPOSITION

other

CASES CITED

- Munoz v. Locke, No. C10-1475-JCC, 2013 WL 12177035, at *2 (W.D. Wash. Feb. 8, 2013)
- Innovative Sols. Int'l, Inc. v. Houlihan Trading Co., No. C22-0296-JCC, 2025 WL 1135037, at *1 (W.D. Wash. Apr. 17, 2025)
- Wilcox v. Hamilton Constr., LLC, 426 F. Supp. 3d 788, 791 (W.D. Wash. 2019)

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