

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Yates v. District of Columbia

Civil Action No. 26-02089 (UNA) (D.D.C. June 17, 2026) · No. Civil Action No. 26-02089 (UNA) · Decided June 17, 2026

SUMMARY

The District Court for the District of Columbia grants the plaintiff’s motion to proceed in forma pauperis, denies her motion for a temporary restraining order, and dismisses the complaint. The court concludes that it lacks jurisdiction to halt or review ongoing proceedings in the District of Columbia Superior Court and dismisses the action under Federal Rule of Civil Procedure 12(h)(3).

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Tanya S. Chutkan
JURISDICTION	United States District Court for the District of Columbia
DECIDED	June 17, 2026
DOCKET	Civil Action No. 26-02089 (UNA)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Pro se plaintiff filed a complaint seeking injunctive relief, a motion to proceed in forma pauperis, and a motion for a temporary restraining order aimed at halting a scheduling order in an ongoing Superior Court of the District of Columbia housing case.
STANDARD OF REVIEW	The court independently assessed its subject matter jurisdiction; a court lacking jurisdiction must dismiss under Federal Rule of Civil Procedure 12(h)(3).
PRECEDENTIAL VALUE	Published memorandum opinion; precedential effect not otherwise specified in the opinion text.

TOPICS

- subject matter jurisdiction
- injunctions
- civil procedure
- federalism

PRACTICE AREAS

- civil procedure
- federal jurisdiction
- injunctive relief

QUESTIONS PRESENTED

1. Whether the district court had subject matter jurisdiction to review or halt an ongoing Superior Court of the District of Columbia proceeding.
2. Whether the district court could issue a temporary restraining order concerning the local-court proceeding.
3. Whether the complaint had to be dismissed under Federal Rule of Civil Procedure 12(h)(3).

HOLDINGS

1. The District Court for the District of Columbia lacked subject matter jurisdiction over the plaintiff's claims because the complaint sought review or appellate mandamus concerning proceedings in the local courts.
2. The district court could not issue a temporary restraining order because it lacked jurisdiction over the underlying case.
3. The complaint had to be dismissed for lack of subject matter jurisdiction.

KEY QUOTATIONS

“Federal courts are courts of limited jurisdiction, possessing “only that power authorized by Constitution and statute,” and it is “presumed that a cause lies outside this limited jurisdiction.”” (2)

“a trial level court in the federal judicial system” (2)

“well settled doctrine that federal courts should not enjoin ongoing state [or District of Columbia] [judicial] proceedings” (2)

FACTUAL BACKGROUND

Marie Yates had an ongoing housing case in the Superior Court of the District of Columbia. She challenged a Superior Court scheduling order that granted a continuance but set a closure date that, in her view, shortened the time available to obtain counsel. Her federal complaint and temporary-restraining-order motion sought to halt or stay those local-court proceedings.

PROCEDURAL HISTORY

The plaintiff's housing case was pending in the Superior Court of the District of Columbia. She filed this federal action seeking to halt or stay a Superior Court scheduling order. The district court granted the motion to proceed in forma pauperis, denied the motion for a temporary restraining order, and dismissed the complaint for lack of subject matter jurisdiction under Federal Rule of Civil Procedure 12(h)(3).

DISPOSITION

dismissed

CASES CITED

- Kokkonen v. Guardian Life Insurance Co. of America, 511 U.S. 375, 377 (1994)
- Barwood, Inc. v. District of Columbia, 202 F.3d 290, 295 (D.C. Cir. 2000)
- United States v. Choi, 818 F. Supp. 2d 79, 85 (D.D.C. 2011)
- Lewis v. Green, 629 F. Supp. 546, 553 (D.D.C. 1986)
- Chen v. Raz, 172 F.3d 918 (D.C. Cir. 1999) (per curiam)
- Amiri v. Gelman Management Co., No. 08-cv-1864, 2010 WL 11575469, at *1 (D.D.C. Feb. 18, 2010), aff'd, 427 F. App'x 17 (D.C. Cir. Sept. 2, 2011)
- Younger v. Harris, 401 U.S. 37, 45 (1971)
- JMM Corp. v. District of Columbia, 378 F.3d 1117, 1120-1122 (D.C. Cir. 2004)

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