

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MISSOURI, SOUTHEASTERN DIVISION

Kendrick Robinson v. Gary Don Williams

Robinson · No. 1:26-cv-00013-SNLJ · Decided March 30, 2026

SUMMARY

The United States District Court for the Eastern District of Missouri sua sponte reviewed subject matter jurisdiction over a federal partition action. The court abstained under the Younger doctrine because a parallel Missouri partition proceeding was ongoing and implicated an important state interest. The action was dismissed without prejudice, and the court certified that an appeal would not be taken in good faith.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Southeastern Division
WRITING FOR THE COURT	Stephen N. Limbaugh, Jr.
JURISDICTION	United States District Court for the Eastern District of Missouri, Southeastern Division
DECIDED	March 30, 2026
DOCKET	1:26-cv-00013-SNLJ
DISPOSITION	dismissed
PROCEDURAL POSTURE	On sua sponte review of subject matter jurisdiction, the federal district court considered whether it could hear a partition action while a parallel Missouri state partition proceeding was pending.
STANDARD OF REVIEW	Sua sponte review of subject matter jurisdiction; dismissal required under Federal Rule of Civil Procedure 12(h)(3) if subject matter jurisdiction is lacking.
PRECEDENTIAL VALUE	Unpublished district court memorandum and order; persuasive but not generally precedential.

TOPICS

- subject matter jurisdiction
- partition
- civil procedure
- real estate

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the federal court was required to abstain under Younger because an ongoing Missouri state partition proceeding implicated an important state interest and provided an adequate opportunity to raise relevant federal questions.
2. Whether the federal partition action should be dismissed without prejudice for lack of subject matter jurisdiction.

HOLDINGS

1. The federal court must abstain from exercising jurisdiction over the federal partition action because an ongoing state judicial proceeding concerned partition of real property, implicated an important state interest, and provided an adequate opportunity to raise relevant federal questions.
2. The federal action must be dismissed without prejudice because the court could not exercise jurisdiction over the federal partition petition while abstaining under Younger.

KEY QUOTATIONS

“Younger abstention requires that federal courts ‘abstain from exercising their jurisdiction if (1) there is an ongoing state proceeding, (2) that implicates important state interests, and (3) that provides an adequate opportunity to raise any relevant federal questions.’”

“If plaintiff wishes to challenge the Missouri partition action, he must pursue his rights in state court, whether by seeking reconsideration there, or by appealing the decision to the state appellate court.”

FACTUAL BACKGROUND

Kendrick Robinson filed a federal petition for partition of real property against Gary Don Williams on January 20, 2026. Before filing the federal action, Robinson had already initiated a partition proceeding in Butler County, Missouri, identified as Case No. 25BT-CV00521. The state proceeding was ongoing and set for a bench trial on June 24, 2026.

PROCEDURAL HISTORY

Plaintiff filed a federal petition for partition of real property on January 20, 2026. At that time, plaintiff already had a pending partition petition in Butler County, Missouri, Case No. 25BT-CV00521, involving the same parties, and that state matter was set for a bench trial. The federal court dismissed the action without prejudice under the Younger abstention doctrine and certified that an appeal would not be taken in good faith.

DISPOSITION

dismissed

CASES CITED

- Bueford v. Resolution Trust Corp., 991 F.2d 481, 485 (8th Cir. 1993)
- New Orleans Pub. Serv. Inc. v. Council of New Orleans, 491 U.S. 350, 359 (1989)
- Arseneau v. Pudlowski, 110 F.4th 1114, 1117 (8th Cir. 2024)
- Tony Alamo Christian Ministries v. Selig, 664 F.3d 1245, 1249 (8th Cir. 2012)
- Ingalls v. Adams Cmty. Bank, No. CV 19-30006-MGM, 2020 WL 3722317, at *4 (D. Mass. Mar. 25, 2020)
- Williams v. County of Riverside, No. 94-55363, 1995 WL 551930, at *3 (9th Cir. Sept. 15, 1995)
- Schroll v. Plunkett, 760 F. Supp. 1378, 1383-84 (D. Or. 1990)
- Nelson v. Kentucky, No. 3:19-CV-454-J-34JBT, 2019 WL 1901433, at *1 (M.D. Fla. Apr. 29, 2019)

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