

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
TEXAS, SAN ANTONIO DIVISION

**Camaray Escobar, Individually and Next Friend of S.W. and A.W. v.
Tasha Meyers, J.C. Hatch, Alyssa Miller, Dayanara Gutierrez,
Sandra Jordan, John/Jane Doe Supervisors, Texas Department of
Family and Protective Services, Cecile Erwin Young, Official
Capacity, Stephanie Muth, Official Capacity, and the Honorable
Judge of the 150th District Court, Official Capacity Only**

Escobar · No. 5:25-CV-01535-JKP · Decided December 2, 2025

SUMMARY

The United States District Court for the Western District of Texas dismissed Camaray Escobar’s action without prejudice for lack of subject-matter jurisdiction. The court held that the requested relief implicated a state child-custody proceeding and was barred by the domestic-relations exception and principles of Younger abstention.

CASE DETAILS

COURT	United States District Court for the Western District of Texas, San Antonio Division
WRITING FOR THE COURT	Jason Pulliam
JURISDICTION	United States District Court for the Western District of Texas, San Antonio Division
DECIDED	December 2, 2025
DOCKET	5:25-CV-01535-JKP
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff moved for a temporary restraining order and preliminary injunction in an action alleging constitutional violations arising from the seizure of her minor children and ongoing state child-custody proceedings. After denying the initial temporary-restraining-order motion, the court considered the amended motion and a magistrate judge's report and recommendation that the case be dismissed for lack of subject-matter jurisdiction.

STANDARD OF REVIEW	The court independently reviewed whether subject-matter jurisdiction existed, accepting well-pleaded allegations as true and construing them in the light most favorable to the plaintiff.
PRECEDENTIAL VALUE	Unpublished federal district court memorandum opinion; persuasive authority only.
PARTIES	Camaray Escobar, Individually and Next Friend of S.W. and A.W. v. Tasha Meyers, J.C. Hatch, Alyssa Miller, Dayanara Gutierrez, Sandra Jordan, John/Jane Doe Supervisors, Texas Department of Family and Protective Services, Cecile Erwin Young, Official Capacity, Stephanie Muth, Official Capacity, The Honorable Judge of the 150th District Court, Official Capacity Only

TOPICS

subject matter jurisdiction child custody family law injunctions civil procedure

PRACTICE AREAS

civil procedure family law civil rights constitutional law remedies

QUESTIONS PRESENTED

1. Whether the federal court had subject-matter jurisdiction over claims seeking relief that would require federal intervention in ongoing state child-custody proceedings.
2. Whether the domestic-relations exception and Younger abstention principles barred the requested federal equitable relief.

HOLDINGS

1. The federal court could not entertain Escobar's action because the requested relief required it to determine or interfere with a domestic-relations child-custody dispute.
2. The court was required to abstain from granting equitable relief because the dispute involved ongoing state judicial proceedings, important state interests in family and child custody, and an adequate opportunity to raise constitutional challenges in state court.

KEY QUOTATIONS

"Federal courts do not have jurisdiction to decide domestic relations disputes." (Analysis)

"Escobar's case is DISMISSED WITHOUT PREJUDICE for lack of subject-matter jurisdiction."
(Conclusion)

FACTUAL BACKGROUND

Escobar alleged that a Bexar County judge, the Texas Department of Family and Protective Services, and agency personnel violated her constitutional rights in connection with the seizure of her two minor children. She sought federal intervention in ongoing state child-custody proceedings, including an injunction against the state court, suppression of toxicology evidence, return of the children to her custody, and damages. Resolution of the requested relief would require the federal court to address the domestic-relations and child-custody dispute.

PROCEDURAL HISTORY

Escobar filed a federal action under 42 U.S.C. § 1983 and sought emergency and permanent relief affecting ongoing Bexar County child-custody proceedings. The initial temporary-restraining-order motion was denied. Magistrate Judge Elizabeth S. Chestney recommended dismissal for lack of subject-matter jurisdiction, and the district court adopted the recommendation in substance, dismissed the case without prejudice, denied pending motions as moot, and directed entry of final judgment.

DISPOSITION

dismissed

CASES CITED

- *Arbaugh v. Y & H Corp.*, 546 U.S. 500, 514 (2006)
- *Ruhrgas AG v. Marathon Oil Co.*, 526 U.S. 574, 583 (1999)
- *Truman v. U.S.*, 26 F.3d 592, 594 (5th Cir. 1994)
- *Rivet v. Regions Bank of La.*, 522 U.S. 470, 475 (1998)
- *Franks v. Smith*, 717 F.2d 183, 185 (5th Cir. 1983)
- *Rykers v. Alford*, 832 F.2d 895, 899-900 (5th Cir. 1987)
- *Younger v. Harris*, 401 U.S. 37, 41-52 (1971)
- *Moore v. Sims*, 442 U.S. 415, 434 (1979)