

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON,
MEDFORD DIVISION

Ronald Satish Emrit v. United States Patent and Trademark Office,
et al.

Emrit · No. 1:25-cv-01499-CL · Decided January 21, 2026

SUMMARY

A United States Magistrate Judge recommends dismissing with prejudice Ronald Satish Emrit's amended complaint against the United States Patent and Trademark Office and other defendants. The recommendation concludes that the complaint fails to state claims for tortious interference, seeks relief the court may lack authority to grant, and is subject to previously imposed filing restrictions; it also recommends denying in forma pauperis status and certifying that an appeal would be frivolous.

CASE DETAILS

COURT	United States District Court for the District of Oregon, Medford Division
WRITING FOR THE COURT	Mark D. Clarke, United States Magistrate Judge
JURISDICTION	United States District Court for the District of Oregon, Medford Division
DECIDED	January 21, 2026
DOCKET	1:25-cv-01499-CL
DISPOSITION	other
PROCEDURAL POSTURE	Findings and recommendation on screening of an amended complaint filed by a plaintiff proceeding in forma pauperis. The magistrate judge recommended dismissal with prejudice, denial of the in forma pauperis application, and certification that an appeal in forma pauperis would be frivolous.
STANDARD OF REVIEW	Screening under 28 U.S.C. § 1915(e)(2)(B); the court liberally construed the self-represented plaintiff's pleadings but required a legally cognizable claim supported by factual allegations.
PRECEDENTIAL VALUE	unpublished, nonprecedential findings and recommendation

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QUESTIONS PRESENTED

1. Whether the amended complaint stated a legally cognizable claim for tortious interference with contract or tortious interference with business relations.
2. Whether the amended complaint should be dismissed with prejudice after the plaintiff was previously given an opportunity to amend.
3. Whether the plaintiff's in forma pauperis application should be denied and a potential IFP appeal certified as frivolous.
4. Whether the plaintiff's failure to satisfy previously imposed filing restrictions provided an alternative basis for dismissal.

HOLDINGS

1. The amended complaint failed to state a legally cognizable claim because it did not connect the elements of either asserted tort to factual allegations of wrongful conduct by the defendants.
2. Dismissal with prejudice was appropriate because plaintiff had already been given an opportunity to amend and the amended complaint failed to cure the previously identified deficiencies; no possible amendment could cure the purported causes of action.
3. The court recommended denying the IFP application and certifying that an appeal from the recommendation would be frivolous and not taken in good faith.
4. The court recommended dismissal for the alternative reason that plaintiff had not complied with the prefiling requirements previously imposed in the District of Oregon.

KEY QUOTATIONS

“Even recognizing that Plaintiff is self-represented and reading the Complaint and the Amended Complaint liberally, the Court finds no legally cognizable claim.” (at 1)

“Having afforded Plaintiff an opportunity to cure his amendment, and Plaintiff having failed to do so, the Court is satisfied that no possible amendment could cure this purported cause of action.” (at 1)

“Notwithstanding such sanctions and admonishments, as well as a resounding lack of success in the federal courts that would give pause to most litigants, Plaintiff has given no hint of abating his pernicious conduct.” (at 2)

FACTUAL BACKGROUND

Plaintiff sought to obtain a design or utility patent from the USPTO concerning ideas related to quantum mechanics, astrophysics, general relativity, and special relativity. His amended complaint asserted tortious

interference with contract and tortious interference with business relations, but did not connect the listed elements to factual allegations of wrongful conduct by the defendants. He also sought an order requiring the USPTO to award him a patent without following the ordinary administrative process or obtaining assistance with the required paperwork.

PROCEDURAL HISTORY

Plaintiff filed the action on August 21, 2025, and sought leave to proceed in forma pauperis. The court previously found that the initial complaint failed to state a claim, dismissed it without prejudice, and granted leave to amend while holding the IFP application in abeyance. After reviewing the amended complaint, the magistrate judge recommended dismissal with prejudice and related IFP relief; the recommendation was to be referred to a district judge, with objections due within fourteen days.

DISPOSITION

other

CASES CITED

- Emrit v. United States Pat. & Trademark Off., No. CV 25-1847, 2025 WL 2674760, at *2 (E.D. La. Sept. 18, 2025)
- Emrit v. Trump, No. 1:19-CV-18, 2019 WL 140107, at *2 (S.D. Ohio Jan. 9, 2019), report and recommendation adopted, No. 1:19CV018, 2019 WL 935028 (S.D. Ohio Feb. 26, 2019)
- Martinez v. Ylst, 951 F.2d 1153 (9th Cir. 1991)

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