

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Simpkins v. State of Tennessee

Simpkins · No. Civil Action No. 25-04566 (AHA) · Decided January 14, 2026

SUMMARY

The United States District Court for the District of Columbia dismissed without prejudice a pro se complaint brought by David M. Simpkins and Sally E. Simpkins against Tennessee and various state and federal actors. The court held that the complaint failed to satisfy Federal Rule of Civil Procedure 8 and that the asserted claims appeared to seek impermissible review of state-court and federal district-court proceedings or interference with ongoing state criminal proceedings under the Rooker-Feldman and Younger doctrines.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Amir H. Ali
JURISDICTION	United States District Court for the District of Columbia
DECIDED	January 14, 2026
DOCKET	Civil Action No. 25-04566 (AHA)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiffs filed a pro se complaint seeking relief related to state-court proceedings, a federal district-court proceeding, and an ongoing Tennessee state criminal proceeding. The District of Columbia district court dismissed the complaint in its entirety without prejudice.
STANDARD OF REVIEW	The complaint was evaluated in light of all filings, with extra leeway afforded to the unrepresented plaintiffs; dismissal was authorized for failure to comply with Rule 8 and required where subject-matter jurisdiction was lacking.
PRECEDENTIAL VALUE	Published memorandum opinion
PARTIES	David M. Simpkins, Sally E. Simpkins v. State of Tennessee, Various state and federal actors

TOPICS

- pleadings
- subject matter jurisdiction
- civil procedure
- constitutional law

PRACTICE AREAS

civil procedure

federal jurisdiction

constitutional law

QUESTIONS PRESENTED

1. Whether the complaint satisfied Federal Rule of Civil Procedure 8's requirement of a short and plain statement showing entitlement to relief.
2. Whether the District Court for the District of Columbia had subject-matter jurisdiction to review or provide relief from the Tennessee state-court proceedings.
3. Whether the court had jurisdiction to review proceedings or filings in another federal district court.
4. Whether the court could enjoin the ongoing Tennessee state criminal proceeding under the Younger abstention doctrine.

HOLDINGS

1. The complaint failed to comply with Rule 8 because its cursory and often unidentified allegations did not give defendants fair notice of the claims and the grounds on which they rested.
2. The court lacked subject-matter jurisdiction over claims that sought review of, or were functionally equivalent to an appeal from, the Tennessee state-court proceedings.
3. The court lacked jurisdiction to review decisions or proceedings of the United States District Court for the Middle District of Tennessee.
4. The court could not enjoin the pending Tennessee state criminal proceeding because plaintiffs showed no extraordinary circumstances warranting an exception to Younger abstention.

KEY QUOTATIONS

"The federal rules require a complaint to contain "a short and plain statement of the claim showing that the pleader is entitled to relief."" (Opinion at 2)

"Under the Rooker-Feldman doctrine, federal district courts may not hear "cases that amount to the functional equivalent of an appeal from a state court."" (Opinion at 4)

"Under the Younger doctrine, "federal courts should not enjoin pending state criminal proceedings absent extraordinary circumstances."" (Opinion at 5)

FACTUAL BACKGROUND

Plaintiffs alleged claims arising from a Tennessee construction dispute, a dismissed case in the Middle District of Tennessee, and a Tennessee state criminal proceeding involving David Simpkins. Their complaint appeared to assert 183 counts in a table identifying alleged actors, laws violated, and unlawful acts, but many counts did not identify a specific defendant or provide factual and legal detail. Plaintiffs also attached numerous documents from other proceedings and sought relief that appeared to require review of state or federal court actions or interference with an ongoing state criminal case.

PROCEDURAL HISTORY

Plaintiffs previously litigated construction-related claims in Tennessee chancery court; after an appeal and remand, the chancery court apparently dismissed the case on remand. Plaintiffs also referenced a dismissed action in the Middle District of Tennessee and a Tennessee state criminal proceeding. They then filed this action in the District Court for the District of Columbia, which dismissed the complaint for failure to satisfy Federal Rule of Civil Procedure 8 and because the requested review or interference with other courts' proceedings was beyond the court's authority.

DISPOSITION

dismissed

CASES CITED

- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555 (2007)
- Ciralsky v. CIA, 355 F.3d 661, 669 (D.C. Cir. 2004)
- Dali v. Walter Reed Nat'l Mil. Med. Ctr., No. 24-cv-3313, 2025 WL 326575, at *1 (D.D.C. Jan. 29, 2025)
- Ho v. Garland, 106 F.4th 247, 250 (D.C. Cir. 2024)
- Brown v. Whole Foods Mkt. Grp., Inc., 789 F.3d 146, 152 (D.C. Cir. 2015)
- Jones v. Horne, 634 F.3d 588, 596 (D.C. Cir. 2011)
- Atherton v. District of Columbia, 567 F.3d 672, 681–82 (D.C. Cir. 2009)
- Kokkonen v. Guardian Life Ins. Co. of Am., 511 U.S. 375, 377 (1994)
- Auster v. Ghana Airways Ltd., 514 F.3d 44, 48 (D.C. Cir. 2008)
- Gray v. Poole, 275 F.3d 1113, 1119 (D.C. Cir. 2002)
- Rooker v. Fid. Trust Co., 263 U.S. 413 (1923)
- D.C. Ct. of Appeals v. Feldman, 460 U.S. 462 (1983)
- Stanton v. D.C. Ct. of Appeals, 127 F.3d 72, 75 (D.C. Cir. 1997)
- Johnson v. De Grandy, 512 U.S. 997, 1005–1006 (1994)
- Nichols v. Vilsack, No. 13-cv-01502, 2015 WL 9581799, at *1 (D.D.C. Dec. 30, 2015)
- Klayman v. Rao, 49 F.4th 550, 552 (D.C. Cir. 2022)
- JMM Corp. v. District of Columbia, 378 F.3d 1117, 1126 (D.C. Cir. 2004)
- Younger v. Harris, 401 U.S. 37 (1971)