

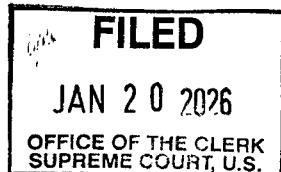
No. _____

ORIGINAL

25-6743

IN THE

SUPREME COURT OF THE UNITED STATES



Gayle George - PETITIONER
(Your Name)

vs.

US Bank National Assn RESPONDENT(S)
as Legal Title Trustee for Truman 2016 SC 6 Title Trust
ON PETITION FOR A WRIT OF CERTIORARI TO

US Court of Appeals for the DC Circuit
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Gayle George
(Your Name)

412 Quaker Street NW
(Address)

Washington DC 20011
(City, State, Zip Code)

202 882-2210
(Phone Number)

QUESTIONS PRESENTED

1. Whether the Rooker–Feldman doctrine bars federal jurisdiction over an original action seeking prospective equitable relief where the plaintiff alleges an independent constitutional injury caused by subsequent or ongoing conduct, rather than by any state-court judgment.
2. Whether due process permits a federal court to extinguish a traditionally equitable claim on jurisdictional grounds without adjudicating whether the alleged injury falls within the court’s jurisdiction, where the plaintiff seeks prospective relief to prevent ongoing constitutional harm.

LIST OF PARTIES AND RELATED CASES

Petitioner:

Gayle George

Respondents:

US Bank National Association as Legal Title Trustee for Truman 2016 SC6
Title Trust, et. al

All respondents to the judgment of the United States Court of Appeals for the District of Columbia Circuit appear in the caption of the case on the cover page.

Additional Clarification Regarding Party Alignment:

Petitioner notes that, although the district court granted leave to file a Second Amended Complaint naming only the subject property as defendant, the district court retained respondents who had been identified in the pleading as parties with potential interests in the property, without explanation. The court of appeals affirmed the dismissal without addressing party alignment or jurisdiction over those respondents.

George v. US Bank as Legal Title Trustee for Truman 2016 SC6 Title Trust, et. al.,
No. 24-cv-01598, US District Court for the District of Columbia. Dismissal entered April 1, 2025.

George v. District of Columbia, et. al., No. 25-7041, U. S. Court of Appeals for the Third Circuit. Summary Affirmance granted October. 15, 2026. Petition for Rehearing En Banc Denied January 2, 2026.

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IN THE
SUPREME COURT OF THE UNITED STATES
PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

OPINIONS BELOW

For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix A to the petition and is

- reported at _____; or,
 has been designated for publication but is not yet reported; or,
 is unpublished.

The opinion of the United States district court appears at Appendix B to the petition and is

- reported at George v. US Bank, No: 1:24-cv-01598 (D.D.C. April 1, 2025), or,
 has been designated for publication but is not yet reported; or,
 is unpublished.

For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix _____ to the petition and is

- reported at _____; or,
 has been designated for publication but is not yet reported; or,
 is unpublished.

The opinion of the _____ court appears at Appendix _____ to the petition and is

- reported at _____; or,
 has been designated for publication but is not yet reported; or,
 is unpublished.

JURISDICTION

For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was 10/15/2025.

No petition for rehearing was timely filed in my case.

A timely petition for rehearing was denied by the United States Court of Appeals on the following date: 1/2/2026, and a copy of the order denying rehearing appears at Appendix C.

An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. A.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

For cases from **state courts**:

The date on which the highest state court decided my case was _____. A copy of that decision appears at Appendix _____.

A timely petition for rehearing was thereafter denied on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. A.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

United States Constitution

Article III, Section 2, Clause 1

“The judicial Power shall extend to all Cases, in Law and Equity, arising under this Constitution, the Laws of the United States, and Treaties made, or which shall be made, under their Authority...”

Amendment V

“No person shall be ... deprived of life, liberty, or property, without due process of law; nor shall private property be taken for public use, without just compensation.”

Amendment VII

“In Suits at common law, where the value in controversy shall exceed twenty dollars, the right of trial by jury shall be preserved...”

(Invoked as historically preserving the distinction between law and equity and access to equitable jurisdiction.)

Amendment IX

“The enumeration in the Constitution, of certain rights, shall not be construed to deny or disparage others retained by the people.”

Federal Statutes

28 U.S.C. § 1254(1)

“Cases in the courts of appeals may be reviewed by the Supreme Court by ... writ of certiorari...”

28 U.S.C. § 1331

“The district courts shall have original jurisdiction of all civil actions arising under the Constitution, laws, or treaties of the United States.”

28 U.S.C. § 2201(a) (Declaratory Judgment Act)

“In a case of actual controversy within its jurisdiction, ... any court of the United States, upon the filing of an appropriate pleading, may declare the rights and other legal relations of any interested party seeking such declaration...”

Judiciary Act of 1789, ch. 20, § 11, 1 Stat. 73

“[T]he circuit courts shall have original cognizance ... of all suits of a civil nature at common law or in equity...”

(Text lengthy; full provision reproduced in Appendix.)

Judiciary Act of 1875, ch. 137, § 1, 18 Stat. 470

“[T]he circuit courts of the United States shall have original cognizance ... of all suits of a civil nature, at common law or in equity ... arising under the Constitution or laws of the United States...”

(Text lengthy; full provision reproduced in Appendix.)

28 U.S.C. § 1738 (Full Faith and Credit Act)

“The records and judicial proceedings of any court of any such State ... shall have the same full faith and credit in every court within the United States...”

(Relevant to improper expansion of Rooker–Feldman beyond its jurisdictional limits.)

District of Columbia Organic Provisions (Jurisdictional Context)

U.S. Constitution, Article I, Section 8, Clause 17

“To exercise exclusive Legislation in all Cases whatsoever, over such District ... as may ... become the Seat of the Government of the United States...”

D.C. Code § 1–102(a)

“The District of Columbia shall remain and continue a body corporate for municipal purposes and may ... exercise all other powers of a municipal corporation not inconsistent with the Constitution and laws of the United States.”

Supreme Court Precedent Implicated (Not Quoted Here)

The following decisions are central to the interpretation and application of the above provisions and are relied upon in the petition:

- *Exxon Mobil Corp. v. Saudi Basic Indus. Corp.*, 544 U.S. 280 (2005)
- *Skinner v. Switzer*, 562 U.S. 521 (2011)
- *Gonzalez v. Crosby*, 545 U.S. 524 (2005)
- *Hazel-Atlas Glass Co. v. Hartford-Empire Co.*, 322 U.S. 238 (1944)

STATEMENT OF THE CASE

A. Proceedings Below

Petitioner, Gayle George, filed an original action in the United States District Court for the District of Columbia seeking prospective equitable relief to prevent imminent and irreparable injury to her asserted equitable interest in residential property located at 412 Quackenbos Street, NW, Washington, D.C. After granting Petitioner leave to file a Second Amended Complaint naming only the subject property as defendant, the district court nevertheless retained in the case caption and disposition respondents identified in the pleading as parties with potential interests in the property, without explanation or jurisdictional findings. The dismissal order did not address the basis for this *sua sponte* retention or its consistency with the amended pleading.

The action was styled as a Bill *Quia Timet* in equity and sought to remove alleged clouds on title and to restrain future enforcement actions predicated on disputed instruments. Petitioner did not seek review or modification of any DC Superior Court judgment. Nor did she request damages or retrospective relief. The complaint alleged ongoing and threatened injury arising from post-judgment enforcement conduct and asserted that no adequate remedy at law existed.

On April 1, 2025, the district court dismissed the action for lack of subject-matter jurisdiction. The court construed the equitable petition as a civil complaint and held that it constituted a “functional appeal” of prior Superior Court proceedings barred by the Rooker–Feldman doctrine. The court further concluded that Petitioner had “no recourse” in federal court “no matter how she styles her pleadings, which respondents she names, or the type of relief she demands.” The court did not conduct discovery, hold an evidentiary hearing, or make factual findings regarding the source of the alleged injury or the nature of the relief sought.

B. Appellate Disposition

Petitioner appealed to the United States Court of Appeals for the District of Columbia Circuit. She argued that the district court misapplied Rooker–Feldman by treating an original federal equity action seeking prospective relief as an impermissible appeal of a local-court judgment, contrary to this Court’s decision in *Exxon Mobil Corp. v. Saudi Basic Industries Corp.*, 544 U.S. 280 (2005), and subsequent cases. The court of appeals summarily affirmed the dismissal, denied rehearing en banc, and subsequently issued a mandate. No alternative grounds for dismissal were identified.

C. Jurisdiction and Finality

The court of appeals' judgment is final. This Court has jurisdiction under 28 U.S.C. § 1254(1). The questions presented are purely legal, were pressed and necessarily rejected below, and do not depend on disputed facts.

D. The Nature of the Federal Question Presented

This case concerns the scope of federal jurisdiction, not the correctness of any state-court judgment. Petitioner's claim rests on the distinction, reaffirmed by this Court, that Rooker–Feldman does not bar federal jurisdiction over independent claims seeking prospective relief for injuries not caused by a state-court judgment itself. *Exxon Mobil*, 544 U.S. at 284; *Skinner v. Switzer*, 562 U.S. 521, 531–32 (2011).

The decision below reflects an application of Rooker–Feldman that forecloses federal equity jurisdiction whenever a claim relates to prior state proceedings, regardless of the source of injury or the relief sought. Other circuits have rejected that approach and have held that federal courts retain jurisdiction in materially indistinguishable circumstances. See, e.g., *Miller v. Dunn*, No. 20-11054 (5th Cir. June 2, 2022); *VanderKodde v. Mary Jane M. Elliott, P.C.*, 951 F.3d 397 (6th Cir. 2020). Absent this Court's review, the scope of Rooker–Feldman will continue to vary by circuit, and federal equity jurisdiction will remain vulnerable to categorical dismissal without adjudication.

REASONS FOR GRANTING THE PETITION

This case presents a clean and appropriate vehicle for resolving the questions presented. The judgment below is final, and the court of appeals affirmed solely on jurisdictional grounds. The federal questions were pressed and necessarily decided. The decision rests entirely on the scope of the Rooker–Feldman doctrine and the availability of federal equity jurisdiction. No alternative grounds support the judgment. Resolution of the questions presented does not depend on disputed facts or interlocutory issues. Accordingly, this Court’s review would conclusively resolve the jurisdictional question on which the dismissal below turned.

I. The Decision Below Expands Rooker–Feldman Beyond This Court’s Precedents and Deepens a Persistent Circuit Conflict

This Court has repeatedly emphasized that the Rooker–Feldman doctrine is a “narrow” jurisdictional rule, confined to cases brought by state-court losers complaining of injuries caused by state-court judgments and seeking federal review and rejection of those judgments. *Exxon Mobil Corp. v. Saudi Basic Indus. Corp.*, 544 U.S. 280, 284 (2005); *Lance v. Dennis*, 546 U.S. 459, 464 (2006).

The decision below departs from that settled limitation. Petitioner brought an original federal action in equity seeking prospective relief to prevent ongoing and future constitutional injury arising from post-filing enforcement conduct. The action did not seek review, reversal, or nullification of any state-court judgment.

Nevertheless, the court of appeals summarily affirmed dismissal on the theory that the federal claims were the functional equivalent of an appeal.

That reasoning conflicts with *Exxon Mobil and Skinner v. Switzer*, 562 U.S. 521 (2011), which make clear that Rooker–Feldman does not apply where a plaintiff presents an independent claim, even if related subject matter was previously addressed in state court. It also conflicts with decisions of other circuits holding that Rooker–Feldman does not bar federal jurisdiction where the alleged injury arises from post-judgment conduct or where the plaintiff seeks prospective relief rather than appellate review. See, e.g., *McCormick v. Braverman*, 451 F.3d 382 (6th Cir. 2006); *VanderKodde v. Mary Jane M. Elliott, P.C.*, 951 F.3d 397 (6th Cir. 2020); *Kougasian v. TMSL, Inc.*, 359 F.3d 1136 (9th Cir. 2004).

Most recently, the Eighth Circuit reaffirmed the narrow scope of the Rooker–Feldman doctrine by rejecting its application to claims alleging injury from post-judgment conduct. In *Sutter & Gillham PLLC v. Henry*, 146 F.4th 699 (8th Cir. 2025), the court vacated a jurisdictional dismissal and held that Rooker–Feldman did not bar an original federal action where the plaintiff did not seek to overturn a state-court judgment, but instead challenged independent conduct occurring after the judgment’s entry. The court emphasized that the doctrine turns

on the source of the alleged injury, not on whether the dispute relates to a matter previously litigated in state court.

This Court's recent grant of certiorari in *T.M. v. University of Maryland Medical System Corp.*, No. 25-197 (U.S. cert. granted Dec. 5, 2025), confirms that the proper scope of the Rooker–Feldman doctrine remains unsettled and in need of clarification. The question presented in *T.M.* concerns whether Rooker–Feldman may be applied where the alleged injury is not caused by a final state-court judgment, but by subsequent or ongoing conduct.

The decision below reflects the same doctrinal error now before this Court in *T.M.* namely, treating Rooker–Feldman as a broad jurisdictional bar whenever a federal claim bears any relation to prior state proceedings, rather than limiting the doctrine to cases seeking appellate review of a state-court judgment itself. Review is warranted to resolve this confusion and to restore the narrow construction this Court has repeatedly reaffirmed.

The lack of consensus is further illustrated by recent decisions of the Ninth Circuit, which have reiterated that Rooker–Feldman is strictly jurisdictional and does not apply to independent claims alleging injury from post-judgment conduct. See, e.g., *Miroth v. County of Trinity*, No. 23-15759 (9th Cir. May 8, 2025). There, the court emphasized that the doctrine turns on the source of the alleged injury.

The decision below deepens an acknowledged circuit split over the proper scope of the Rooker–Feldman doctrine. While the Sixth, Eighth, and Ninth Circuits permit federal jurisdiction over independent claims seeking prospective relief for injuries caused by post-judgment conduct, the D.C. Circuit treats such claims as categorically barred whenever they are deemed to be “inextricably intertwined” with prior state proceedings. This is the case even where the plaintiff does not seek review or rejection of a state-court judgment. The identified conflict is outcome-determinative, as follows: Under the governing law of the Sixth, Eighth, or Ninth Circuits, petitioner’s claims would proceed; however, under the D.C. Circuit’s rule, they are categorically dismissed at the threshold.

II. The Decision Below Illustrates a Structural Foreclosure of Federal Equity Jurisdiction

This case illustrates a structural problem in the administration of federal jurisdiction beyond misapplication of doctrine. The reasoning employed below reflects an approach under which entire classes of claims are routinely dismissed at the jurisdictional threshold—particularly those construed as contesting matters related to judicial foreclosure, even when those complaints raise federal questions and seek prospective relief. The district court dismissed the case without factual development, discovery, or evidentiary hearing. The court of appeals effectively extinguished a traditionally equitable cause of action as a matter of categorical

jurisdictional exclusion. This absence of adjudication was compounded by unresolved procedural irregularities, including the district court’s sua sponte retention of respondents, without any findings regarding jurisdiction or necessity.

This Court has long held that federal courts have a “virtually unflagging obligation” to exercise the jurisdiction conferred upon them. *Colorado River Water Conservation Dist. v. United States*, 424 U.S. 800, 817 (1976). Equity jurisdiction, in particular, may not be denied by judicial habit or administrative convenience. *Cohens v. Virginia*, 19 U.S. (6 Wheat.) 264, 404 (1821).

By applying Rooker–Feldman to foreclose federal adjudication without any inquiry into the source of the alleged injury or the nature of the relief sought, the decision below effectively converts a narrow jurisdictional doctrine into a categorical bar to equity. That result conflicts with this Court’s precedents and threatens to insulate ongoing constitutional violations from federal review.

III. Summary Affirmance Without Any Adjudicative Process Raises an Important Due Process Question

The dismissal of Petitioner’s equitable claim occurred without any hearing, factual findings, or opportunity to develop a record, notwithstanding allegations of ongoing and irreparable injury occurring during the pendency of the federal action. The court of appeals’ summary affirmance treated the jurisdictional question as so clear as to require no explanation.

This Court has recognized that due process requires a meaningful opportunity to be heard before the deprivation of protected interests, particularly where a cause of action itself is extinguished. *Mathews v. Eldridge*, 424 U.S. 319 (1976); *Logan v. Zimmerman Brush Co.*, 455 U.S. 422 (1982). While jurisdictional questions may be resolved as matters of law, they may not be used as a procedural shortcut to avoid adjudicating independent federal claims within the court's competence.

The use of summary dismissal and affirmance in this case underscores the need for this Court to clarify the proper limits of Rooker–Feldman and to ensure that jurisdictional doctrines are not deployed to eliminate federal equity jurisdiction wholesale. The due process concern here arises not from the merits of Petitioner's claim, but from the use of a jurisdictional doctrine to foreclose adjudication of claims that fall within the court's conceded subject-matter competence.

IV. This Case Is a Clean Vehicle for Resolving Recurring Jurisdictional Confusion

This case presents a final judgment, preserved federal questions, and a purely legal dispute over the scope of federal jurisdiction. The issues were pressed and necessarily rejected below. Their resolution does not depend on disputed facts. Absent this Court's intervention, lower courts will continue to apply Rooker–Feldman inconsistently, denying access to federal courts for claims Congress empowered them to decide. Review is warranted to restore doctrinal

clarity and to reaffirm the limited role of Rooker–Feldman in the federal jurisdictional framework.

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,



Date: 1/20/2026