Negative Inferences and Unusual Alliances: Supreme Court Wades Back Into the *Rooker-Feldman* Doctrine

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***T.M. v. Univ. of Maryland Med. Sys. Corp.*, 608 U.S. ___ (June 18, 2026)**

U.S. Supreme Court opinions issued in June are often described as "sharply divided," usually along (perceived) ideological lines concerning high-profile disputes. This June, another "sharply divided" opinion appeared — not over a hot-button issue in the media, but a somewhat arcane corner of federal procedure: the *Rooker-Feldman* doctrine. Under *Rooker-Feldman*, federal district courts generally lack jurisdiction to hear lawsuits claiming injuries from judgments issued by state courts.

In *T.M. v. University of Maryland Medical System Corporation*, the Supreme Court issued a 5-4 split decision. Notably, this split did not track the conventional liberal/conservative divide. Instead, it concerned the scope of *Rooker-Feldman* and the doctrine's limits on the jurisdiction of federal district courts. In *T.M.*, a majority of the Supreme Court held that *Rooker-Feldman* bars federal-court lawsuits claiming injuries from state-court judgments, even if those judgments are still on appeal. *T.M.* confirms that *Rooker-Feldman* remains a viable basis for policing the jurisdiction of federal courts.

Background

After experiencing a medical emergency in March 2023, T.M. was involuntarily committed to a medical facility in the University of Maryland Medical System ("U of M"). After litigation in various forums, including a habeas corpus action in Maryland state court, T.M. and U of M negotiated a settlement for T.M.'s release. The Maryland judge in the habeas proceeding issued a consent order providing for T.M.'s release, subject to several conditions.

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Ten days later, T.M. and her parents filed suit in federal court, challenging the consent order on multiple grounds — including alleged violations of T.M.'s state and federal due-process rights, and that the order was allegedly obtained under duress — and sought to enjoin the order. T.M. also directly appealed the consent order to the Appellate Court of Maryland, "rais[ing] similar arguments." That appeal was stayed while the federal action was pending.

The federal district court dismissed T.M.'s lawsuit for lack of jurisdiction under the *Rooker-Feldman* doctrine. The U.S. Court of Appeals for the Fourth Circuit affirmed. T.M. sought review in the U.S. Supreme Court.

The federal courts of appeals had been divided over a certain aspect of *Rooker-Feldman*: whether the doctrine is "triggered by a state-court judgment that remains subject to further review in state court." Some circuits said yes, while others had required the state-court proceedings to have "ended" before the doctrine applies. The Supreme Court granted certiorari to resolve this circuit split.

Supreme Court's Opinion

In a 5-4 ruling, the Supreme Court sided with the former view and affirmed the Fourth Circuit's ruling. Justice Sotomayor authored the majority opinion, joined by Justices Thomas, Alito, Kavanaugh, and Jackson. Justice Thomas also wrote a separate concurrence.

Under *Rooker-Feldman*, plaintiffs who "essentially invit[e] federal courts of first instance to review and reverse unfavorable state-court judgments are "seeking an exercise of appellate jurisdiction" from the district court. But under 28 U.S.C. § 1257, only the U.S. Supreme Court — and not federal district courts — has *appellate* jurisdiction over judgments by a state's highest court.

Based on this framework, the Supreme Court held that "T.M.'s case falls within 'the narrow ground occupied by *Rooker-Feldman*'" because she "is complaining of injuries caused by, and is seeking relief from, the state-court judgment itself." Where, as here, a plaintiff "does not like the result reached in state court and [has] 'repaired to federal court to undo the [state] judgment,'" *Rooker-*

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Feldman applies.

It did not matter that T.M.'s appeal was still pending in the Appellate Court of Maryland. Requiring the state-court proceeding to end with a judgment by the state's highest court — and thus potentially satisfying the Supreme Court's appellate jurisdiction under 28 U.S.C. § 1257 — before *Rooker-Feldman* kicks in would, in the majority's view, engraft "a new requirement" onto the doctrine. Such a rule would be at odds with prior precedent and principles of federalism and likely produce "anomalous outcomes."

To be sure, a lawsuit asserting federal-question claims like violations of due process nominally invokes the district court's *original* jurisdiction. But according to the majority, *Rooker-Feldman* embraces "a different, more functional view," examining "what in substance" the plaintiff seeks in federal court.

Here, T.M.'s federal-court action sought federal-court review — i.e., the functional equivalent of an appeal — of the state-court judgment. Simply because the Supreme Court did not yet have appellate jurisdiction per Section 1257 over an eventual ruling by the Maryland Supreme Court did not mean that, ipso facto, lower federal courts had original jurisdiction to hear T.M.'s claims.

Justice Barrett authored a dissenting opinion, joined by Chief Justice Roberts and Justices Kagan and Gorsuch. To "hold the line" against expansion of *Rooker-Feldman*, which already "stands on shaky ground," the dissent would limit the doctrine's application to state-court actions that have "ended."

For the dissent, the crucial point was that the doctrine rests on "a negative inference" from Section 1257: "If there is no final judgment from a state high court, § 1257 does not confer jurisdiction in this Court." Therefore, nothing should "'preclud[e]' district courts from exercising the jurisdiction they would 'otherwise' have" to hear claims based on federal-question or diversity jurisdiction — which would include "collateral attacks" on state-court rulings.

Here, because the Maryland appeal was pending, the case fell "outside the narrow confines in which *Rooker-Feldman* continues to operate, and the District Court had jurisdiction." According to the

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dissent, the majority opinion, by ruling otherwise, expanded the scope of *Rooker-Feldman* and "muddied waters that were hardly clear to begin with."

Key Takeaways

- Rumors of *Rooker-Feldman*'s demise have been exaggerated. The doctrine bars federal-court jurisdiction over claims seeking relief from state-court judgments, even if those judgments are still on appeal.
- Defendants do not have to wait for the state-court appeal to cycle through the state's highest court. During the appeal, *Rooker-Feldman* remains an arrow in the defendant's quiver when moving to dismiss a federal action that claims harm from the state-court judgment. And, because it is jurisdictional, *Rooker-Feldman* may be raised by the defendant — or even sua sponte by the court — at any stage.
- The dissent asks what *Rooker-Feldman* "brings to the table," given that rules of claim preclusion, including the Full Faith and Credit Act, as well as abstention doctrines, also serve to avoid duplicative litigation in state and federal courts and improper collateral attacks on state-court judgments. Where *Rooker-Feldman* fills the gaps amid these other rules will no doubt serve as fodder for future disputes.

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