exception to the mandate of the *res judicata* statute.[1303] An exception to § 1738 "will not be recognized unless a later statute contains an express or implied partial repeal."[1304] Thus, a claimant who pursued his employment discrimination remedies through state administrative procedures, as the federal law requires her to do (within limits), and then appealed an adverse state agency decision to state court will be precluded from bringing her federal claim to federal court, since the federal court is obligated to give the state court decision "full faith and credit."[1305]

Closely related is the *Rooker-Feldman* doctrine, holding that federal subject-matter jurisdiction of federal district courts does not extend to review of state court judgments.[1306] The Supreme Court, not federal district courts, has such appellate jurisdiction. The doctrine thus prevents losers in state court from obtaining district court review, but "does not otherwise override or supplant preclusion doctrine or augment the circumscribed doctrines that allow federal courts to stay or dismiss proceedings in deference to state-court actions."[1307]

Three-Judge Court Act.—When the Court in *Ex parte Young*[1308] held that federal courts were not precluded by the Eleventh Amendment from restraining state officers from enforcing state laws determined to be in violation of the federal Constitution, serious efforts were made in Congress to take away the authority thus asserted, but the result instead was legislation providing that suits in which an interlocutory injunction was sought against the enforcement of state statutes by state officers were to be heard by a panel of three federal judges, rather than by a single district judge, with appeal direct to the Supreme Court.[1309] The provision was designed to assuage state feeling by vesting such determinations in a court more prestigious than a single-judge district court, to ensure a more authoritative determination, and to prevent the assertion of indi-

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[1303] 449 U.S. at 96–105. In England v. Louisiana Bd. of Medical Examiners, 375 U.S. 411 (1964), the Court held that, when parties are compelled to go to state court under *Pullman* abstention, either party may reserve the federal issue and thus be enabled to return to federal court without being barred by *res judicata*.

[1304] Kramer v. Chemical Construction Corp., 456 U.S. 461, 468 (1982).

[1305] 456 U.S. 468–76. There were four dissents. Id. at 486 (Justices Blackmun, Brennan, and Marshall), 508 (Stevens).

[1306] The doctrine derives its name from Rooker v. Fidelity Trust Co., 263 U.S. 413 (1923), and District of Columbia Court of Appeals v. Feldman, 460 U.S. 462 (1983).

[1307] Exxon Mobil Corp. v. Saudi Basic Industries Corp., 544 U.S. 280, 284 (2005) (*Rooker-Feldman* has no application when federal court proceedings have been initiated prior to state court proceedings; preclusion law governs in that situation).

[1308] 209 U.S. 123 (1908).

[1309] 36 Stat. 557 (1910). The statute was amended in 1925 to apply to requests for permanent injunctions, 43 Stat. 936, and again in 1937 to apply to constitutional attacks on federal statutes. 50 Stat. 752.