

The police searched a woman's home without probable cause or a warrant. Based on the evidence discovered during the search, the woman was charged with first-degree murder in state court. At trial, the woman objected to the admission of the evidence on the grounds that the police unconstitutionally searched her home and seized the evidence. After a hearing on the issue, the court overruled the woman's objection and admitted the evidence. Immediately after this ruling, the woman filed a complaint in federal court to enjoin the state court from proceeding with her prosecution because the police violated her constitutional rights.

Should the federal court hear the woman's claim?

- A. No, because the federal court does not have subject-matter jurisdiction over the case.
- B. No, because the federal court must abstain from hearing the case.
- C. Yes, because the woman was prosecuted in bad faith.
- D. Yes, because the woman's claim arises under the U.S. Constitution.

Explanation:

A federal court generally must adjudicate a suit over which it has **subject-matter jurisdiction**. This jurisdictional requirement can be satisfied through diversity jurisdiction or **federal-question jurisdiction**—ie, when the plaintiff's claim arises under the U.S. Constitution, federal law, or a treaty. Here, the woman's complaint asserts a constitutional violation, so subject-matter jurisdiction exists (**Choice A**).

However, a federal court with subject-matter jurisdiction may or must abstain from hearing a case in limited situations. One situation arises under the **Younger abstention doctrine**, which applies when declaratory or injunctive relief is sought in federal court. This doctrine *requires* abstention when such relief would interfere with a **pending state proceeding** on any criminal matter or a particular civil matter* that:

- involves an important state interest *and*
- provides an **adequate opportunity to litigate** the federal issue(s).

Here, the woman is asking the federal court to enjoin the pending state criminal proceeding against her. However, the state has an important interest in enforcing its own criminal law, and the woman was given an opportunity to litigate her constitutional claim at the hearing. As a result, the federal court must abstain from hearing her claim (**Choice D**). If the woman is convicted, she can raise her constitutional challenge through the state's appellate process.

*Only certain civil proceedings qualify for Younger abstention, including enforcement proceedings akin to a prosecution (eg, termination of parental rights) and proceedings that further a state court's ability to perform judicial functions (eg, contempt).

(Choice C) There are several exceptions to the *Younger* abstention doctrine, including when the state initiates a criminal prosecution in bad faith because there was no reasonable expectation of conviction. This exception does not apply here because, while the police may have acted unconstitutionally, there is no indication that the state prosecuted the woman in bad faith.

Educational objective:

The *Younger* abstention doctrine requires a federal court to abstain when a declaratory judgment or injunction by that court would interfere with a pending state criminal, or particular civil, proceeding that (1) involves an important state interest and (2) provides an adequate opportunity to litigate federal issues.

References

- *Younger v. Harris*, 401 U.S. 37, 40 (1971) (establishing the Younger abstention doctrine).

- Sprint Commc'ns, Inc. v. Jacobs, 571 U.S. 69, 81 (2013) (listing the requirements for Younger abstention).
- 32A Am. Jur. 2d Federal Courts § 1035 (2020) (explaining Younger abstention).

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***Younger* abstention doctrine**

