The Honorable Tana Lin

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

Frank's Landing Indian Community, a self-governing dependent Indian community, by and through its Community Council (Yesmowit Mills, chairman; Keetchud'cabacud Kay Mills, vice chair; Chi-Tol-Bia Mills, secretary; Yekaboltza Mills, council member; Marie Frank Ironpipe, council member), and its members, including the above-named council members and Clarence Sidney Mills, Ervina "Binah" McCloud, Deonna McCloud, Sy-kah Mills John, Dakota Case, Dillon Woodward, and Qual-Beet-Tub Mills, all in their official capacities and personal capacities as members of federally recognized tribes and as beneficiaries of rights under the Treaty of Medicine Creek (1854),

Plaintiffs,

vs.

Linda Myhre Enlow, in her official capacity as clerk of the Superior Court for Thurston County, Washington,

Defendant.

Case No. 3:25-cv-05929

PLAINTIFFS' REPLY IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION

NOTE ON MOTION CALENDER: November 21, 2025

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I. Introduction

This case presents one fundamental question that no court has yet answered: Is the Wa He Lut parcel Indian country under federal law? Plaintiffs seek a single, narrowly tailored remedy—an injunction to pause ministerial acts in a state proceeding until this federal court resolves that threshold jurisdictional question.

The answer matters. If the land is Indian country under 18 U.S.C. § 1151(b), then the state court never had jurisdiction to adjudicate claims arising from it. Importantly, the state court has never addressed, analyzed, or ruled on this federal question. Although Plaintiffs raised the issue and submitted controlling federal documentation, the Superior Court expressly declined to decide it. There is, therefore, no final state judgment on this issue—only a pending proceeding built on unresolved and unreviewed federal law.

Because the core issue remains undecided, the Rooker-Feldman doctrine does not bar this suit. Plaintiffs do not seek review or reversal of a final state judgment; they ask this Court to exercise its original jurisdiction under 28 U.S.C. §§ 1331 and 1362 to answer a question of exclusive federal concern. See *Exxon Mobil Corp. v. Saudi Basic Indus. Corp.*, 544 U.S. 280, 291–294 (2005).

Defendant's opposition fails to engage with this federal foundation. Instead, it raises procedural defenses—standing, immunity, abstention—that obscure rather than address the merits. But the relief Plaintiffs seek is narrow and lawful: a temporary injunction halting only those clerical acts that enable an ultra vires assertion of state power over Indian country. That is

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precisely the kind of prospective relief authorized under *Ex parte Young*, 209 U.S. 123 (1908), and long recognized in federal Indian law jurisprudence.

II. Plaintiffs' Claims Present a Justiciable Controversy Under Article III, and Clerk Enlow Is a Proper Defendant Under Ex parte Young

Clerk Enlow asserts that Article III precludes this action, contending that her role is non-adversarial and that Plaintiffs' alleged injuries are neither fairly traceable to her conduct nor redressable by prospective relief. This argument cannot be reconciled with the prevailing standards of federal Indian law and constitutional justiciability.

This case presents a live federal question: whether the Wa He Lut parcel is "Indian country" under 18 U.S.C. § 1151(b). If so, state court proceedings there—including those facilitated by Clerk Enlow—would violate federal statutes that reserve exclusive jurisdiction to federal and tribal authorities, namely 28 U.S.C. § 1360, 18 U.S.C. § 1162, and 25 U.S.C. § 1322(b). These statutes do not establish comprehensive remedial schemes that displace equitable relief, nor do their texts foreclose injunctions against state officials engaged in ultra vires acts. For example, 25 U.S.C. § 1322 specifically preserves federal restrictions on Indian trust property and does not authorize state adjudication of its ownership or possession. See, e.g., *In re Marriage of Landauer*, 95 Wn. App. 579, 584–85, 975 P.2d 577 (1999) (discussing § 1322 as prohibiting state jurisdiction over such lands); *Jicarilla Apache Tribe v. United States*, 601 F.2d 1116, 1133 (Ct. Cl. 1979) (regarding limits on state power over Indian lands).

Federal courts have consistently recognized the availability of injunctive relief to prevent unlawful state intrusion into Indian country. In *Ute Indian Tribe of the Uintah & Ouray Reservation v. Lawrence,* 875 F.3d 539, 542–48 (10th Cir. 2017) the court held that 25 U.S.C. §

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1322 requires tribal consent before the exercise of state jurisdiction, and absent such consent, permitted the federal courts to grant injunctive relief to prevent state court overreach. See also *Ute Indian Tribe of the Uintah & Ouray Reservation v. Lawrence*, 22 F.4th 892, 897 (10th Cir. 2002) (affirming ongoing injunctive relief). Similarly, in *In re Marriage of Landauer*, the court recognized that § 1322 precludes state court adjudication regarding Indian trust lands and thus supports equitable relief to enforce these jurisdictional boundaries.

Judicial interpretation of § 1322 and related authority confirms that federal courts may enjoin state actors to protect tribal rights and restrain state encroachment. The Tenth Circuit in *Sac & Fox Nation v. Pierce*, 213 F.3d 566, 574 (10th Cir. 2000) upheld federal intervention to prevent state taxation inconsistent with § 1322 and the federal interest in tribal self-government.

Ex parte Young, 209 U.S. 123, 156–60 (1908), remains the cornerstone for authorizing injunctive relief against state officials in ongoing violation of federal law, including ministerial officials. See, e.g., Dairy Mart Convenience Stores, Inc. v. Nickel (In re Dairy Mart Convenience Stores, Inc.), 411 F.3d 367, 372–73 (2d Cir. 2005) (affirming application of Ex parte Young to ministerial actions); *Freedom from Religion Found., Inc. v. Abbott*, 955 F.3d 417, 424 (5th Cir. 2020; *Armstrong v. Wilson*, 124 F.3d 1019, 1025 (9th Cir. 1997); *Indus. Servs. Grp., Inc. v. Dobson*, 68 F.4th 155, 164 (4th Cir. 2023).

To invoke Ex parte Young, Plaintiffs must show: (1) the suit is against a state official in her official capacity; (2) there is an ongoing violation of federal law; and (3) the relief sought is prospective. These requirements are met regardless of whether the official's actions are discretionary or ministerial. See *Freedom from Religion Found*., 955 F.3d at 424; *Armstrong*, 124 F.3d at 1025; *Cressman v. Thompson*, 719 F.3d 1139, 1146 (10th Cir. 2013).

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Moreover, a sufficient connection must exist between the state official and the enforcement of the challenged conduct. See *Dairy Mart*, 411 F.3d at 372–73; *Indus. Servs. Grp.*, 68 F.4th at 164; *Cressman v. Thompson*, 719 F.3d 1139, 1146 (10th Cir. 2013).

Clerk Enlow's reliance on *Whole Woman's Health v. Jackson,* 595 U.S. 30 (2021), is misplaced. There, clerks lacked any direct enforcement connection, whereas here, Clerk Enlow's official actions perpetuate a live federal jurisdictional violation under federal Indian law.

The Ninth Circuit confirms federal jurisdiction to enjoin state officials regarding Indian land disputes. *Santa Rosa Band of Indians v. Kings County,* 532 F.2d 655, 658–59, 662 (9th Cir. 1975) (recognizing federal jurisdiction to prevent local enforcement violating federal limitations under § 1360 and policies favoring tribal self-government). *Ute Indian Tribe of the Uintah & Ouray Reservation v. Lawrence*, 875 F.3d at 542–48, is directly on point regarding ongoing injunctive relief.

Article III and *Ex parte Young* focus not on adverseness in the conventional sense but on whether the challenged state action contributes to an ongoing violation of federal law. Plaintiffs' injuries are fairly traceable to Clerk Enlow's conduct and are redressable by prospective injunctive relief. See *Muscogee (Creek) Nation v. Pruitt*, 669 F.3d 1159, 1167 (10th Cir. 2012) (outlining the "straightforward inquiry" for standing and Ex parte Young).

In sum, this action presents a justiciable controversy. Clerk Enlow's acts fall squarely within *Ex parte Young*, and Plaintiffs have standing under Article III to seek prospective relief to halt her facilitation of an ongoing violation of federal law and the dependent Indian community's congressionally delegated authority to self-govern.

III. Eleventh Amendment and Immunity Doctrines Do Not Bar Equitable Relief in Federal Indian Law Context

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Defendant's reliance on Eleventh Amendment immunity mischaracterizes the nature of the relief sought and the controlling federal doctrine. Plaintiffs seek no damages or retrospective relief, but rather request narrowly tailored prospective injunctive relief to halt Clerk Enlow's ministerial acts that continue to enable state court jurisdiction over property within Indian country, where federal law prohibits such adjudication. This claim is squarely within the exception to state sovereign immunity recognized in *Ex parte Young*, 209 U.S. 123 (1908), which permits injunctive relief against state officials committing ongoing violations of federal law. *Oneida Indian Nation v. County of Oneida*, 414 U.S. 661, 666–67 (1974); *Boisclair v. Superior Court,* 51 Cal. 3d 1140, 1155–57, 276 Cal. Rptr. 62, 801 P.2d 305 (1990).

Congress has wholly preempted the field regarding property rights in Indian trust or restricted land. Once an area of state law has been completely preempted, any claim based on that law becomes a federal claim from its inception and therefore arises under federal law. Id.; *Boisclair*, 51 Cal. 3d at 1156. Federal statutes, including 28 U.S.C. § 1360(b), 18 U.S.C. § 1162(b), and 25 U.S.C. § 1322(b), prohibit state court adjudication of ownership, possession, or interests in Indian trust or restricted lands. When a party alleges that such land is at issue, exclusive jurisdiction belongs to the federal or tribal courts, and any state court proceedings are ultra vires. Permitting state court officials, even those in ministerial roles, to facilitate proceedings over Indian trust land directly contradicts federal law and Congress's manifest intent to occupy the field. *Boisclair*, 51 Cal. 3d at 1156.

The well-pleaded complaint rule does not restrict federal-question jurisdiction in this context. Claims involving Indian trust land, regardless of state-law characterization, are inherently federal and properly invoke federal jurisdiction. *Oneida Indian Nation*, 414 U.S. at 666–67.

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Clerk Enlow's processing of filings, docket entries, and case management functions are not neutral when they enable the unlawful assertion of jurisdiction over Indian land. Federal courts have held that ministerial state officials may be enjoined when their acts perpetuate ongoing violations of federal law. *Courthouse News Serv. v. Gilmer*, 48 F.4th 908, 910–13 (8th Cir. 2022); *Kodiak Oil & Gas (USA) Inc. v. Burr*, 932 F.3d 1125, 1131–32 (8th Cir. 2019).

Although *Whole Woman's Health v. Jackson*, 595 U.S. 30 (2021), limited *Ex parte Young* in certain pre-enforcement suits involving neutral clerical conduct, Jackson involved speculative harm and non-enforcement acts by court clerks. Here, by contrast, Clerk Enlow's conduct enables actual, ongoing jurisdictional violations in an area where Congress has specifically withdrawn state authority.

The relief sought is prospective: an order preventing further administrative facilitation of proceedings over Indian land until its federal status is resolved. This form of relief fits comfortably within *Ex parte Young* and modern federal Indian law jurisprudence. *Santa Rosa Band of Indians v. Kings County*, 532 F.2d 655 (9th Cir. 1975); *Ute Indian Tribe of the Uintah & Ouray Reservation v. Lawrence*, 875 F.3d 539 (10th Cir. 2017).

Because Clerk Enlow's acts facilitate a continuing violation of federal law within a field of exclusive federal jurisdiction, Eleventh Amendment immunity does not bar this suit. Enjoining such acts is required to ensure the supremacy of federal law and protect exclusive jurisdiction over Indian country. *Boisclair*, 51 Cal. 3d at 1156; *Oneida Indian Nation*, 414 U.S. at 666–67.

IV. Quasi-Judicial Immunity Does Not Shield State Court Clerks from Equitable Relief in Violation of Federal Indian Law

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Defendant Enlow's reliance on quasi-judicial immunity misconstrues both the doctrine's limitations and the preemptive effect of federal Indian law. While quasi-judicial immunity may protect nonjudicial officers for certain actions closely tied to the judicial process, that shield is neither absolute nor automatic—particularly where ministerial or administrative acts facilitate proceedings that federal law expressly prohibits.

First, the Supreme Court and Ninth Circuit have consistently limited absolute immunity to acts integrally related to judicial decision-making and requiring judicial discretion. See *Mireles v. Waco*, 502 U.S. 9, 11–13 (1991); *Duvall v. County of Kitsap*, 260 F.3d 1124, 1133–34 (9th Cir. 2001). Ninth Circuit precedent is clear that a clerk's ministerial or administrative acts are not protected by quasi-judicial immunity when those acts contribute to ongoing violations of federal statutory law. *Greater L.A. Council on Deafness v. Zolin*, 812 F.2d 1103, 1108–11 (9th Cir. 1987) ("the lynchpin ... is whether the act is an 'integral part of the judicial process'"); *Mireles,* 502 U.S. at 12 (no immunity for acts taken in the complete absence of jurisdiction).

Second, and directly relevant here, Congress has completely preempted state court adjudicatory authority over Indian trust or restricted lands through 28 U.S.C. § 1360(b), 18 U.S.C. § 1162(b), and 25 U.S.C. § 1322(b). See *Boisclair v. Superior Court*, 51 Cal. 3d 1140, 1146–47, 1153–56, 276 Cal. Rptr. 62, 801 P.2d 305 (1990). Where Congress has expressly withdrawn state power, state officials—including court clerks—cannot claim immunity for actions that are ultra vires or perpetuate proceedings in the absence of jurisdiction. *Mireles*, 502 U.S. at 11–12; *Duvall,* 260 F.3d at 1133–34.

Defendant's reliance on *Moore v. Urquhart*, 899 F.3d 1094, 1104 (9th Cir. 2018), is misplaced. *Moore* addressed cases where judicial immunity may preclude injunctive relief if a party retains effective appellate remedies within the state system. That rationale is inapplicable

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here, where federal law has wholly divested state courts of jurisdiction over the matter. When Congress removes the foundational jurisdiction, no appeal in the state system can remedy the federal violation. As a result, federal injunctive relief remains available to halt ongoing violations of federally protected rights. See *Papasan v. Allain,* 478 U.S. 265, 278 (1986).

Additionally, Washington law confirms that county court clerks are not mere recordkeepers but exercise discrete enforcement powers. Under RCW 2.32.050, county clerks are authorized to issue writs of execution, garnishment, attachment, restitution, sale, and other orders that operationalize and enforce judgments, affecting significant property and liberty interests. The issuance and certification of such writs and orders by the clerk are direct enforcement functions within the state's judicial machinery. See also Thurston County, "Clerk's Duties" (describing issuance of court orders and writs as quasi-judicial functions). These functions mirror the enforcement authority recognized in sheriffs in cases such as *Planned Parenthood of Idaho, Inc. v. Wasden*, 376 F.3d 908, 919–20 (9th Cir. 2004) (action proper under Ex parte Young so long as official has a "meaningful connection" to enforcement of the challenged law). Thus, Clerk Enlow's statutory role as an enforcement agent establishes both her connection to the challenged conduct and her exposure to prospective relief under *Ex parte Young*, 209 U.S. 123, 157 (1908); see also RCW 2.32.050.

In summary, quasi-judicial immunity does not insulate state court clerks from prospective equitable relief when their statutory enforcement powers directly enable state proceedings that are federally preempted. Where Congress has fully preempted state jurisdiction, federal law requires that immunity doctrines yield to the exclusive authority of federal and tribal courts. See *Boisclair*, 51 Cal. 3d at 1156–57*; Santa Rosa Band of Indians v. Kings County*, 532 F.2d 655, 663–64 (9th Cir. 1975); *Ex parte Young*, 209 U.S. 123, 157 (1908). To the extent defendants rely

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on unpublished or district court decisions, those cases are not binding and do not alter or overrule controlling Ninth Circuit and Supreme Court precedent. See Fed. R. App. P. 32.1(a); 9th Cir. R. 36-3(a).

V. Rooker-Feldman Is Inapplicable Where Federal Law Bars State Jurisdiction Over Indian Country

Defendants' reliance on the Rooker-Feldman doctrine and its progeny is misplaced and inapplicable for three principal reasons:

First, Rooker-Feldman applies only when a federal plaintiff seeks appellate review of a state court's judgment—either by requesting explicit reversal or presenting "injuries caused by state court judgments rendered before the district court proceedings commenced and inviting district court review of those judgments." *Exxon Mobil Corp. v. Saudi Basic Indus. Corp.*, 544 U.S. 280, 284 (2005). Plaintiffs do not seek an order reversing or modifying a state judgment. They seek only prospective relief to enforce controlling federal statutes (28 U.S.C. § 1360, 18 U.S.C. § 1162, and 25 U.S.C. § 1322(b)) that categorically divest state courts of jurisdiction over property rights in Indian country. Because no final (or even interlocutory) state court judgment on the federal question exists—and the state courts are, by law, barred from even reaching that question—there is nothing for this Court to review or "appeal" within the meaning of Rooker-Feldman.

Second, the federal statutes at issue withhold from state courts all subject-matter jurisdiction over trust and restricted Indian property rights. 25 U.S.C. § 1322(b) prohibits state courts from adjudicating "the ownership or right to possession of any real or personal property… belonging to any Indian or Indian tribe that is held in trust by the United States…." 28 U.S.C. §

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1360(b) and 18 U.S.C. § 1162 reinforce this federal preemption. This is not a "civil rights case in disguise," nor a mere repackaging of a lost state claim; it is a matter of federal exclusivity, and thus no "inextricably intertwined" state law or judgment exists to which Rooker-Feldman could attach. See *In re Marriage of Landauer*, 95 Wn. App. 579, 581, 584, 975 P.2d 577 (1999).

Third, Plaintiffs seek only to prospectively enjoin future actions by state officials that are ultra vires under federal law—not to undo any state ruling. This is a classic example of a federal court's exclusive jurisdiction to halt ongoing violations of federal law, as recognized in *Papasan v. Allain*, 478 U.S. 265, 278 (1986) ("Relief that serves directly to bring an end to a present violation of federal law is not barred by the Eleventh Amendment…"). The relief sought here does not require any finding the state court was "wrong," but simply recognition that Congress has reserved all authority over these issues to itself and the federal courts.

The case law defendants cite—Rooker, Feldman, and their Ninth Circuit progeny—applies only to true "de facto appeals" of state judgments on issues within state court competence. It does not, and cannot, bar this Court from exercising jurisdiction over original federal claims that state courts are expressly forbidden by Congress from adjudicating. Where, as here, 28 U.S.C. § 1360, 18 U.S.C. § 1162, and 25 U.S.C. § 1322(b) strip state courts of power, Rooker-Feldman simply does not apply. See *Exxon Mobil*, 544 U.S. at 291–92; *In re Marriage of Landauer,* 95 Wn. App. at 581–84; *Papasan*, 478 U.S. at 278.

VI. The Equities and Public Interest Strongly Favor Injunctive Relief

Defendants' contention that an injunction would undermine the public interest or frustrate open justice fails for several reasons. Plaintiffs seek only to enjoin ministerial acts that would facilitate state proceedings expressly barred by federal law in Indian country. Defendant Enlow

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faces no cognizable hardship from being temporarily restrained from ultra vires functions, while Plaintiffs face ongoing irreparable harm to federally protected cultural, governmental, and property interests.

The Ninth Circuit expressly holds that "serious questions going to the merits and a balance of hardships that tips sharply in the plaintiff's favor can support issuance of a preliminary injunction," especially to safeguard federal rights. *Alliance for the Wild Rockies v. Cottrell,* 632 F.3d 1127, 1131–32 (9th Cir. 2011). This is even more so where, as here, federal law withdraws state authority and the federal government's distinctive trust duty to tribes is triggered. See *United States v. Mitchell*, 463 U.S. 206, 225 (1983); *In re Marriage of Landauer*, 95 Wn. App. at 584 ; *Ute Indian Tribe of the Uintah & Ouray Reservation v. Lawrence*, 875 F.3d 539, 548 (10th Cir. 2017).

The public interest is best served by honoring federal statutes—25 U.S.C. § 1322(b), 28 U.S.C. § 1360(b), 18 U.S.C. § 1162(b)—which expressly preclude state jurisdiction over trust lands, and by vindicating the federal trust responsibility to shield tribal lands from state encroachment. Any temporary effect on state court recordkeeping is minimal compared to the irreparable federal and tribal interests at stake. Because Plaintiffs would face profound injury absent injunction, while Defendant faces none, both the equities and public interest support relief. See *Alliance for the Wild Rockies*, 632 F.3d at 1131–32; *Mitchell*, 463 U.S. at 225.

VII. Conclusion

Plaintiffs respectfully request that this Court grant their Motion for Preliminary Injunction and enjoin Defendant Linda Myhre Enlow, in her official capacity as Clerk of the Thurston County Superior Court, from performing any ministerial acts that facilitate proceedings

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in *Wa He Lut Indian School v. Anza Smith*, Case No. 24-2-02515-34, pending final resolution of this action.

DATED this 21st day of November, 2025.

Respectfully Submitted,

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I certify that this memorandum contains 3,246 words, in compliance with the Local Civil Rules.

CERTIFICATE OF SERVICE

I certify that I caused a copy of the foregoing document to be served on all parties or their counsel of record on the date indicated below, by electronic mail via PACER.

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I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

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DATED this 21st day of November, 2025.

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