NOT PRECEDENTIAL

UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT

No. 26-2106

ALLEN JEFFREY SATZ,
Appellant

v.

AVA RENEE SATZ

On Appeal from the United States District Court
for the District of New Jersey
(D.C. No. 2:25-cv-16567)
District Judge: Honorable Susan D. Wigenton

Submitted Pursuant to Third Circuit LAR 34.1(a)
September 16, 2026
Before: CHAGARES, *Chief Judge*, HARDIMAN and FREEMAN, *Circuit Judges*

(Opinion filed November 12, 2026)

OPINION[*]

PER CURIAM

Allen Satz appeals *pro se* from the District Court's order dismissing his complaint pursuant to the *Rooker-Feldman* doctrine. We will vacate and remand.

[*] This disposition is not an opinion of the full Court and pursuant to 3d Cir. I.O.P. 5.7 does not constitute binding precedent.

I.

Satz and his then-wife, Ava, began divorce proceedings in New Jersey in 2018 after twelve years of marriage. She eventually sent him a summons to appear before a *beis din*—an Orthodox Jewish rabbinical court that arbitrates religious divorces—and issue her a bill of divorce known as a *get*. Although the couple's marriage officially ended in the eyes of New Jersey civil authorities in October 2020 after two years of "contentious litigation," their marital settlement agreement obliged them to proceed before and be bound by the decision of a *beis din* in New City, New York.[1] Satz initially failed to participate, so Ava filed a motion to enforce the agreement, which the Superior Court of New Jersey, Family Part, granted. Satz then signed an arbitration agreement in which he acceded to a hearing and accepted the *beis din*'s rules and procedures, including its power to arbitrate in his absence and to sanction him for failing to comply with its ruling. The *beis din* ruled in Ava's favor in February 2023, ordered Satz to pay $150 for each day he failed to give the *get*, and authorized his public shaming until he complies. Satz tried to contest the settlement agreement back in state court without success. *See Satz*, 301 A.3d at 851-54, 856-57.

Ava subsequently moved to confirm the arbitration award. The trial court ordered Satz to pay her $91,500 as a sanction for violating the *beis din*'s ruling. Satz filed a

[1] The settlement agreement expressly provides that the *beis din* "shall have the authority to order monetary awards relating to the Jewish law matters before it, which awards may be confirmed in a court of law," and that the trial court may impose additional monetary and other sanctions for noncompliance with the agreement. *See Satz v. Satz*, 301 A.3d 847, 852 (N.J. Super. Ct. App. Div. 2023) (quoting Article IX of marital settlement agreement), *certif. denied*, 308 A.3d 266 (N.J. Feb. 7, 2024).

motion to vacate the arbitration decision, asserting that the proceedings violated the settlement agreement, that the ruling defamed him, and that the *beis din* lacked authority to sanction him; he also suggested that one of the arbitrator's signatures had been forged. The trial court denied his motion because the settlement agreement plainly authorizes monetary sanctions, Satz failed to identify a false statement for defamation purposes, and he filed his motion seven months beyond the 120-day limitations period set forth in New Jersey's Uniform Arbitration Act, N.J. Stat. Ann. § 2A:23B-23. The Appellate Division affirmed last summer. *See Satz v. Satz*, 2025 WL 1891438, at *1-3 (N.J. Super. Ct. App. Div. July 9, 2025) (per curiam), *certif. denied*, 345 A.3d 600 (N.J. Nov. 17, 2025). Satz still had not given Ava the *get* by that point.

Three months later, Satz initiated this matter by filing a complaint against Ava in the United States District Court for the District of New Jersey under 42 U.S.C. § 1983, which he amended to raise thirteen causes of action under state and federal law.[2] A Magistrate Judge ordered him to show cause why the action should not be dismissed under *Rooker-Feldman* given that his pleadings largely turn upon the state courts'

[2] Despite only naming his ex-wife as a defendant, Satz asserted that the Superior Court violated his First and Fourteenth Amendment rights by sanctioning him (First, Second, and Eighth Causes); that Ava and two other entities conspired to violate his civil rights by having him publicly shamed, thereby interfering with the exercise of his religious rights (repeated "Second" and Tenth Causes); that the arbitration ruling bears a false signature in violation of N.J. Stat. Ann. § 2C:21-1 (Third Cause); that Ava put him in a false light by publicizing the ruling and invaded his privacy by taking his photograph during a Zoom session (Fourth and Fifth Causes); that she breached the settlement agreement (Sixth Cause); that she perjured herself by submitting the *beis din* ruling to the Superior Court (Seventh Cause); that the arbitrators overstepped their authority under 5 U.S. Code § 575 (Ninth Cause); that Ava interfered with his parental rights (Eleventh Cause); and that she intentionally caused him emotional distress (Twelfth Cause).

supposed misapplication of the law. Satz responded that he does not seek review or reversal of the state court decisions, but rather relief from Ava's use of the *beis din* arbitration ruling to have him sanctioned. Reiterating his earlier arguments, Satz contended that the ruling should be invalidated because it contains false statements and bears a forged signature. The District Court adopted the Magistrate Judge's recommendation and dismissed the amended complaint for lack of subject-matter jurisdiction over Satz's objections. He appeals.

II.

We have jurisdiction under 28 U.S.C. § 1291. We review the District Court's dismissal order *de novo*. *In re Adams*, 151 F.4th 144, 150 (3d Cir. 2025); *Great W. Mining & Min. Co. v. Fox Rothschild LLP*, 615 F.3d 159, 163 (3d Cir. 2010).

III.

The *Rooker-Feldman* doctrine precludes federal courts from considering "cases brought by state-court losers complaining of injuries caused by state-court judgments rendered before the district court proceedings commenced and inviting district court review and rejection of those judgments." *Exxon Mobil Corp. v. Saudi Basic Indus. Corp.*, 544 U.S. 280, 284 (2005); *accord T.M. v. Univ. of Md. Med. Sys. Corp.*, 608 U.S. ___, 146 S. Ct. 1739 (2026). We have identified

> four requirements that must be met for the *Rooker-Feldman* doctrine to apply: (1) the federal plaintiff lost in state court; (2) the plaintiff 'complain[s] of injuries caused by [the] state-court judgments'; (3) those judgments were rendered before the federal suit was filed; and (4) the plaintiff is inviting the district court to review and reject the state judgments.

Great W. Mining, 615 F.3d at 166 (quoting *Exxon Mobil*, 544 U.S. at 284). Critically, because the doctrine is a "narrow" one that "applies only in limited circumstances," *id.* at 169 (quoting *Lance v. Dennis*, 546 U.S. 459, 464-66 (2006)), courts must assess each cause of action individually "to determin[e] whether a federal suit presents an independent, non-barred claim," *id.* at 166; *see Gilbank v. Wood Cnty. Dep't of Human Servs.*, 111 F.4th 754, 765 (7th Cir. 2024) (citing *D.C. Ct. of App. v. Feldman*, 460 U.S. 462, 486-87 (1983)).

The District Court erred by failing to employ the piecemeal approach the foregoing precedents require. It reasoned that Satz "is essentially challenging the validity of the arbitration ruling, which effectively calls for [it] to reject and overrule the state courts' determination that the arbitration ruling was valid," because "the crux of [his] claims rests on his assertion that the arbitration ruling should be deemed invalid." ECF Doc. 12 at 3. It is true that some of Satz's claims may be barred by *Rooker-Feldman* for those reasons. For instance, his first cause of action claims that the state court erred by fining him $91,500 and seeks to void that order. But other claims do not similarly invite review and rejection of state judgments. That is particularly true of certain claims against Ava, the only named defendant, a few of which appear to allege garden-variety torts under New Jersey law (e.g., intentional infliction of emotional distress). Because the District Court did not perform the required claim-by-claim analysis, we will vacate its judgment and remand the case for it to do so in the first instance.[3]

[3] Other defenses may also apply; we likewise leave that analysis to the District Court to perform in the first instance. *See Vuyanich v. Smithton Borough*, 5 F.4th 379,

389 (3d Cir. 2021).