BLD-006 **NOT PRECEDENTIAL**

UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT

No. 26-3198

IN RE: CATHERINE WAKEFIELD,
Petitioner

On a Petition for Writ of Mandamus to the
United States District Court for the District of New Jersey
(Related to 2:25-cv-14600)

Submitted Pursuant to Rule 21, Fed. R. App. P.
October 1, 2026

Before: KRAUSE, PHIPPS, and CHUNG, *Circuit Judges*

(Opinion filed November 17, 2026)

OPINION*

PER CURIAM

Catherine Wakefield, proceeding pro se, seeks a writ of mandamus. For the reasons below, we will deny the petition.

In August 2025, Wakefield filed a complaint in the District Court against the Superior Court of New Jersey, alleging violations of her Fourteenth Amendment rights

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

and of the protections established in the Americans with Disabilities Act, 42 U.S.C. §§ 12101-12213, related to her New Jersey state court divorce proceedings. She also filed an "Emergency Motion for Injunctive Relief" ("the August Motion for Injunctive Relief")—docketed as a motion for a temporary restraining order—seeking to prevent entry of a final judgment in the divorce case. Despite multiple warnings that non-attorneys, like herself, are not permitted to use electronic signatures, *see* D.N.J. Loc. R. 5.2(12), Wakefield failed to file an amended complaint containing a traditional signature. Consequently, on November 10, 2025, the District Court issued a letter order administratively terminating her case and advising that the case could not be reinstated until she filed an amended complaint with a proper signature, in compliance with Local Rule 5.2.

Wakefield subsequently filed a slew of documents, and the District Court again advised that her case could not be reinstated until she complied with the November 10, 2025, order. Wakefield informed the court that she was "working diligently" to prepare an amended complaint, ECF 31, and then submitted an "Amended Complaint and Emergency Application for a Temporary Restraining Order and for Declaratory and Injunctive Relief." On August 27, 2026, the District Court "liberally construe[d]" that filing as the operative amended complaint because it "technically complied with the signature requirement," ECF 41 at 2, and ordered the Clerk to reopen the matter. In doing so, the District Court noted that "extraordinary injunctive relief is not warranted" and

thus denied "any other pending requests for interim injunctive relief . . . as procedurally improper and moot[.]" *Id.* at 3. On September 3, 2026, Wakefield filed this mandamus petition, asking this Court to rule on the August Motion for Injunctive Relief—or to compel the District Court to do the same—and to intervene in her divorce proceedings.

A writ of mandamus is a drastic remedy that is available only in extraordinary circumstances. *In re Diet Drugs Prods. Liab. Litig.*, 418 F.3d 372, 378 (3d Cir. 2005). Mandamus should not issue unless the petitioner has "no other adequate means to attain the relief" sought and has shown that his right to the writ is "clear and indisputable." *Id.* at 378-79 (quoting *Cheney v. United States Dist. Ct.*, 542 U.S. 367, 380-81 (2004)).

Wakefield cannot make this requisite showing. She seeks an order resolving the August Motion for Injunctive Relief or directing the District Court to do so. However, as noted above, the District Court already denied any pending requests for injunctive relief, which includes the August Motion for Injunctive Relief. Accordingly, we cannot grant the requested relief, and the petition is thus denied as moot. *See Blanciak v. Allegheny Ludlum Corp.*, 77 F.3d 690, 698-99 (3d Cir. 1996).

Further, to the extent that Wakefield seeks this Court's intervention in a state court action, we lack authority to grant such relief. *See In re Richards*, 213 F.3d 773, 781 (3d Cir. 2000) (explaining that, ordinarily, federal courts of appeal "lack appellate jurisdiction over their state counterparts, thus making writs of mandamus generally inappropriate"); *White v. Ward*, 145 F.3d 1139, 1140 (10th Cir. 1998) (per curiam)

(explaining that a federal court "lack[s] jurisdiction to direct a state court to perform its duty").

For these reasons, we will deny the mandamus petition.