

UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT

No. 26-3234

IN RE: SANDRA ROLLINS,
Petitioner

On a Petition for Writ of Mandamus from the
United States District Court for the Middle District of Pennsylvania
(Related to M.D. Pa. Civ. No. 3:23-cv-00864)

Submitted Pursuant to Rule 21, Fed. R. App. P.
October 8, 2026

Before: PORTER, MATEY, and MONTGOMERY-REEVES, *Circuit Judges*

(Opinion filed: October 28, 2026)

OPINION*

PER CURIAM

Pro se petitioner Sandra Rollins seeks a writ of mandamus. Because she has not demonstrated that she is entitled to such relief, we will deny her petition.

In 2023, Rollins initiated a counseled lawsuit in the District Court, alleging race

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

discrimination in the township's zoning enforcement decisions. In the course of discovery proceedings, counsel for Rollins sought to withdraw from representing her. After holding a hearing, where Rollins was not present, the District Court allowed the attorney to withdraw and gave Rollins time to secure new representation or to proceed pro se. When no attorney entered an appearance for Rollins, the District Court deemed her to be proceeding pro se.

Rollins filed a series of motions, which sought: (1) to compel her former counsel to surrender her case file; (2) sanctions and contempt proceedings against her former counsel for failing to properly inform her about the status of her case; and (3) transcripts and audio recordings of hearings, among other requests. The Clerk of Court instructed Rollins on how to obtain transcripts, and the District Court denied Rollins' remaining requests, concluding that it had no legal authority to order Rollins' former counsel to turn over the file.

Rollins responded by filing a flurry of new motions; as relevant here, she repeated several of her prior requests and sought the District Judge's recusal. The District Court denied these motions, noting that: (1) it had previously ruled on her request to compel the production of her client file by her former counsel; (2) the Clerk of Court had already informed Rollins of how to request hearing transcripts; and (3) there was no basis for recusal, as Rollins' dissatisfaction stemmed from the District Judge's rulings and management of the case.

Rollins subsequently initiated a mandamus proceeding in this Court, requesting that we direct recusal of the District Judge and “preserve the original audio” from District Court hearings. *See* Mandamus Pet. at 13-14. A writ of mandamus is a “drastic remedy” that may be granted “only in extraordinary circumstances in response to an act amounting to a judicial usurpation of power.” *In re Diet Drugs Prods. Liab. Litig.*, 418 F.3d 372, 378 (3d Cir. 2005) (citation omitted). “Before a writ of mandamus may issue, a party must establish that (1) no other adequate means [exist] to attain the relief he desires, (2) the party’s right to issuance of the writ is clear and indisputable, and (3) the writ is appropriate under the circumstances.” *Hollingsworth v. Perry*, 558 U.S. 183, 190 (2010) (per curiam) (alteration in original) (citation modified).

Rollins has not shown her entitlement to the extraordinary remedy of mandamus relief. To the extent that she disagrees with the District Court’s handling of her motions, mandamus is not a substitute for appeal.¹ *See Madden v. Myers*, 102 F.3d 74, 77 (3d Cir. 1996); *see also In re Kensington Int’l Ltd.*, 353 F.3d 211, 219 (3d Cir. 2003) (“If, in effect, an appeal will lie, mandamus will not.”).

¹ Regarding Rollins’ requests for audio recordings in this Court, she has not shown a clear and indisputable right to such recordings, as “audiotapes that merely back up the court reporter’s stenographic record” are “the personal property of the reporter” and are not subject to disclosure “unless some reason is shown to distrust the accuracy of the stenographic transcript.” *Smith v. U.S. Dist. Ct. Officers*, 203 F.3d 440, 442 (7th Cir. 2000); *see also In re Pratt*, 511 F.3d 483, 485 (5th Cir. 2007).

Disagreement with the District Court's decisions is also Rollins' basis for seeking recusal and alleging bias, but we perceive no evidence of bias here. *See In re Kensington*, 368 F.3d at 300-01 (explaining that mandamus may be used to review a judge's refusal to recuse pursuant to 28 U.S.C. § 455(a), where "a reasonable person, with knowledge of all the facts, would conclude that the judge's impartiality might reasonably be questioned"). Rollins claims that the District Court failed to evaluate certain details when it considered her motions, or that the District Court misconstrued some of her requests but does not explain how that differs from disagreement with the District Court's rulings, which may be resolved on appeal. *See Liteky v. United States*, 510 U.S. 540, 555 (1994) ("[J]udicial rulings alone almost never constitute a valid basis for a bias or partiality motion."); *SecuraComm Consulting, Inc. v. Securacom Inc.*, 224 F.3d 273, 278 (3d Cir. 2000) ("We have repeatedly stated that a party's displeasure with legal rulings does not form an adequate basis for recusal[.]"). Rollins' subjective belief that the District Judge is biased against her does not show that recusal is warranted. We express no opinion on the merits of Rollins' requests in the District Court.

Accordingly, we will deny Rollins' petition.