

SUMMARY STATEMENT

Greenfield v. Meyer

Docket No. 49851

Christina Greenfield appealed the decision of Administrative District Judge for the First Judicial District (“the ADJ”) designating her as a vexatious litigant under Idaho Court Administrative Rule 59(d). The order prohibited Greenfield from filing any new pro se litigation in the State of Idaho without first obtaining leave of the court where the litigation is proposed to be filed.

On appeal, Greenfield alleged that the ADJ abused her discretion in four ways when she designated Greenfield as a vexatious litigant. First, Greenfield alleged that the ADJ was biased against her and should have been disqualified for cause. Second, Greenfield alleged that the ADJ did not follow the procedures prescribed in Idaho Court Administrative Rule 59 when the ADJ failed to allow her to respond to the order. Third, Greenfield argued that she was not afforded a proper opportunity to be heard on the proposed factual findings contained in the order, thereby violating her right to procedural due process. Finally, Greenfield argued that the order was based on incorrect facts and lacked sufficient factual findings.

The Idaho Supreme Court affirmed, concluding that the ADJ did not abuse her discretion when she designated Greenfield as a vexatious litigant. The Court held that the ADJ did not abuse her discretion by refusing to grant Greenfield’s motion to disqualify because Greenfield failed to establish any fact suggesting a bias held by the ADJ against her. With respect to Greenfield’s claim that the ADJ violated ethical rules, the Court held that Greenfield had failed to point to any unethical conduct with particularity or cite sufficient authority, making it too indefinite to be considered by the Court. The Court also determined that the ADJ followed the procedure set forth in Idaho Court Administrative Rule 59, and gave Greenfield proper notice and an opportunity to respond, thereby affording her due process of law. Finally, the Court held that the ADJ properly determined that Greenfield met the criteria of Idaho Court Administrative Rule 59 by finding that Greenfield had maintained at least three pro se litigation that had been determined adversely to her within the previous seven years.

******This summary constitutes no part of the opinion of the Court, but has been
Prepared by court staff for the convenience of the public.******