

# Colin Winkler Discusses the Importance of the *Rooker-Feldman* Defense in Combating Duplicative Litigation

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In the January 26, 2026, issue of the AccountsRecovery.net *ARM Compliance Digest*, Hinshaw partner Colin Winkler examines the significance of a recent Minnesota district court decision that largely denied a motion to dismiss in a pro se Fair Debt Collection Practices Act (FDCPA) case.

Colin highlights the strategic value of invoking the *Rooker-Feldman* defense when a consumer's federal claims effectively seek to revisit or unwind a prior state-court judgment. He further discusses how a well-framed claim preclusion argument can complement *Rooker-Feldman*, offering courts a pragmatic pathway to curb duplicative litigation. However, practitioners must navigate the state-law nuances, questions of privity, and the doctrine's context-sensitive application.

The partial dismissal order issued in this case reminds us that whenever a debt collector has taken judgment against a consumer in state court and the consumer later files a federal complaint challenging that judgment, the debt collector should almost always raise the *Rooker-Feldman* defense in an effort to knock out any of the consumer's claims that substantively attack the state court decision or seek to undo it. This defense requires a juxtaposition of the claims and issues at the core of the two cases, and although it may not dispatch the consumer's claims completely, it often succeeds, as it did here, in limiting the live claims and simplifying the overall defense.

In addition, this decision shows how a *Rooker-Feldman* argument can pair favorably with an assertion of res judicata—specifically, the bar of “claim preclusion.” Like a *Rooker-Feldman* defense, this judicial canon requires a nuanced analysis, but it's a potentially dispositive argument that's worth invoking, as it offers judges a quick exit ramp where a consumer's suit engenders duplicative or redundant litigation. See., e.g., *Reiger v. St. Charles Health Sys.*, No. 6:24-cv-00334-MC, 2025 LX 150536, at \*36 (D. Or. June 13, 2025) (dismissing a consumer's claims in a federal action where the consumer could have brought the same

claims defensively against the debt collector in an earlier state-court collection action that had yielded a default judgment against the consumer).

Note that a claim preclusion analysis can be subject to greater judicial discretion than *Rooker-Feldman* determinations, and it can mutate between cases because it requires federal courts to apply state preclusion rules. Accordingly, when making a claim preclusion argument, it's critical to draw clear, straight lines for the court between the facts and claims at issue in the current case and those in the prior case and to sketch out relevant state law with precision. You may also have to tease out questions about privity between the prior defendant and current defendant. Even if you merely end up setting the table for a possible claim-preclusion dismissal later, as may be the case here in *Blanc*, it's worth advancing this powerful jurisprudential doctrine early, as it can obviate the need for a court to (re)adjudicate a consumer's complaints on the merits.

**Read the full January 26, 2026, edition**

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**Colin D. Winkler**

Partner

📞 612-334-2727

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