

Highlights

SIGNIFICANT TRENDS

This Pamphlet includes cases and materials on the following significant trends in the field of Government Takings, including:

United States Supreme Court

- T. M. v. University of Maryland Medical System Corporation, 2026 WL 1751823 (U.S. 2026) (Rooker-Feldman doctrine bars suits in federal district court seeking review of state-court judgments that remain subject to further review in state appellate proceedings, as well as suits in federal district court from final judgments of a state’s highest court) (§ 3:25, n.1; § 3:51, n.5; § 5:13, n.4).
- Pung v. Isabella County, Michigan, 2026 WL 1791309 (U.S. 2026) (former owner of real estate foreclosed by county for unpaid taxes should receive only the surplus proceeds from the tax sale measured as the difference between the *foreclosure sale price* and the tax debt *not* the difference between the property’s fair market value and the tax debt) (§ 3:10, n.12; § 3:11, n.6; § 3:16, n.4; § 3:30, n.1; § 5:3, n.3; § 12:25, n.2).

Lower Federal Courts, State Courts and Additional Materials

- Gillispie v. Miami Twp., Ohio, 2025 WL 1276900 (6th Cir. 2025) (\$45 Million judgment against police officer personally and against township entity for indemnity of police officer on § 1983 due process claims for unconstitutional suppression of exculpatory material and for unconstitutional suggestive identification resulting in over two decades of wrongful incarceration of plaintiff, upheld) (§ 2:22, n.4; § 3:10, n.12).
- GHP Management Corporation v. City of Los Angeles, 2024 WL 2795190 (9th Cir. 2024) (landlords’ Fifth Amendment Takings Clause claims challenging City’s eviction moratorium ordinance enacted during the COVID-19 pandemic properly dismissed because no *physical taking* nor *regulatory taking* properly alleged) (§ 2:10, n.1).

GOVERNMENT TAKINGS

I would like to thank my wife Karen L. Martinez for her support and encouragement.

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