

UNPUBLISHEDUNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

No. 25-1343

In re: JANE DOE,

Petitioner.

On Petition for Writ of Mandamus to the United States District Court for the Eastern District of Virginia, at Alexandria. (1:25-cv-00127-PTG-IDD; 1:25-cv-00129-PTG-IDD)

Submitted: June 12, 2025

Decided: June 17, 2025

Before HARRIS and HEYTENS, Circuit Judges, and FLOYD, Senior Circuit Judge.

Petition denied by unpublished per curiam opinion.

Jane Doe, Petitioner Pro Se.

Unpublished opinions are not binding precedent in this circuit.

PER CURIAM:

Jane Doe petitions for a writ of mandamus primarily seeking an order directing the district court judge and magistrate judge to recuse themselves from her civil case. Doe also seeks several other forms of relief, including transferring her civil cases to a different district, declaratory relief, proceeding under a pseudonym in the district court, and entering judgment in her favor in her civil actions. We conclude that Doe is not entitled to mandamus relief.

Mandamus relief is a drastic remedy and should be used only in extraordinary circumstances. *Cheney v. U.S. Dist. Ct.*, 542 U.S. 367, 380 (2004); *In re Murphy-Brown, LLC*, 907 F.3d 788, 795 (4th Cir. 2018). Further, mandamus relief is available only when the petitioner has a clear right to the relief sought and “has no other adequate means to attain the relief [he] desires.” *Murphy-Brown*, 907 F.3d at 795 (alteration and internal quotation marks omitted).

We conclude that Doe is not entitled to mandamus relief. In particular, while mandamus may be used to seek recusal of a district court judge, *see In re Beard*, 811 F.2d 818, 827 (4th Cir. 1987), Doe’s allegations of judicial inaction and conclusory assertions of bias are insufficient to warrant recusal, *see Belue v. Leventhal*, 640 F.3d 567, 572-73 (4th Cir. 2011). Moreover, the remaining forms of relief Doe requests are not available by way of mandamus. Accordingly, we deny all of Doe’s pending motions, and deny the

petition and amended petitions for writ of mandamus. We dispense with oral argument because the facts and legal contentions are adequately presented in the materials before this court and argument would not aid the decisional process.

PETITION DENIED