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Wrong Doctrine, Right Result—Preclusion Versus ‘Rooker-Feldman’

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In a recent U.S. Court of Appeals for the Third Circuit decision, *In re Eileen T. Adams*, the appellate court blocked just such an effort following an analysis of the Rooker-Feldman doctrine and the ultimate application of preclusion principles. This decision supports the general proposition that a bankruptcy proceeding cannot be used to revive foreclosure-related disputes that have been previously and conclusively resolved by a state court.

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