

NOTE: This order is nonprecedential.

# United States Court of Appeals for the Federal Circuit

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In Re DARNELL CARTER,  
*Petitioner*

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2026-110

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On Petition for Writ of Prohibition to the United States  
Court of Federal Claims in No. 1:25-cv-01884-RAH, Judge  
Richard A. Hertling.

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## ON PETITION

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Before REYNA, BRYSON, and STARK, *Circuit Judges*.

PER CURIAM.

## O R D E R

The United States Court of Federal Claims ordered Darnell Carter to show cause why his tax refund claims should be not dismissed without prejudice for lack of jurisdiction, directing him to submit the documentation he filed with the Internal Revenue Service to support that court's jurisdiction. Mr. Carter now petitions this court for a writ of prohibition preventing enforcement of that order.

Issuance of a writ "is a drastic and extraordinary remedy reserved for really extraordinary causes." *Cheney v. U.S. Dist. Ct. for D.C.*, 542 U.S. 367, 380 (2004) (cleaned

up). A petitioner seeking such relief must show: (1) “no other adequate means to attain the relief he desires,” (2) a “clear and indisputable” right to relief, and (3) the writ is “appropriate under the circumstances.” *Id.* at 380–81 (cleaned up). Mr. Carter has not shown a clear and indisputable right to relief or that he cannot raise his challenges to the order on appeal after a final judgment.

Accordingly,

IT IS ORDERED THAT:

The petition is denied, and any pending motion is denied.

FOR THE COURT



Jarrett B. Perlow  
Clerk of Court

December 12, 2025  
Date