

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

William Edgar Lewis et al. v. Richard Keuerleber et al.

Lewis · No. 1:25-CV-447 · Decided December 4, 2025

SUMMARY

The United States District Court for the Middle District of Pennsylvania denied the plaintiffs’ post-judgment motions challenging the court’s jurisdiction and consent to magistrate judge jurisdiction. The court held that the plaintiffs’ written consent was valid, that the remaining defendants had consented expressly or through their conduct, and that the motions were untimely and unsupported by good cause or extraordinary circumstances. The clerk was directed to close the case.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Martin C. Carlson
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	December 4, 2025
DOCKET	1:25-CV-447
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiffs filed post-judgment motions challenging the magistrate judge's jurisdiction and seeking reassignment to a district judge after the court had dismissed their complaint on the merits. The court denied the jurisdictional motions and directed the clerk to close the case.
STANDARD OF REVIEW	The court evaluated withdrawal of consent under the good-cause and extraordinary-circumstances standards of 28 U.S.C. § 636(c)(4), considering the timeliness and good faith of the motions, prejudice, voluntariness, possible bias, and the interests of justice.
PRECEDENTIAL VALUE	Unknown
PARTIES	William Edgar Lewis et al., Holmes v. Richard Keuerleber et al., York County Administration Office, York County Judicial Center

TOPICS

subject matter jurisdiction

civil procedure

PRACTICE AREAS

civil procedure

constitutional law

civil rights

QUESTIONS PRESENTED

1. Whether plaintiffs could withdraw or invalidate their consent to magistrate judge jurisdiction after judgment based on alleged delay, dissatisfaction with the magistrate judge's rulings, or a purported belief that consent was limited to a particular magistrate judge.
2. Whether magistrate judge jurisdiction was lacking because two defendants initially had not filed express written consents, despite their litigation conduct implying consent and their later filing express written consents.
3. Whether plaintiffs' post-judgment jurisdictional motions demonstrated good cause or extraordinary circumstances warranting withdrawal of the reference under 28 U.S.C. § 636(c)(4).

HOLDINGS

1. Consent to magistrate judge jurisdiction under 28 U.S.C. § 636(c) need not always be express; it may be inferred from a party's conduct during litigation.
2. Withdrawal of consent to magistrate judge jurisdiction is not an absolute right; after referral, withdrawal requires good cause or extraordinary circumstances under 28 U.S.C. § 636(c)(4), and a timely motion.
3. A party's dissatisfaction with a magistrate judge's substantive rulings does not establish good cause or extraordinary circumstances for withdrawing consent or vacating the reference.
4. The plaintiffs' written consent was not judge-specific and remained valid after reassignment from one magistrate judge to another.

KEY QUOTATIONS

“It is also well established that a party’s consent to magistrate judge jurisdiction need not be express but can be inferred from the litigants’ conduct.” (8)

“The court may, for good cause shown on its own motion, or under extraordinary circumstances shown by any party, vacate a reference of a civil matter to a magistrate judge under this subsection.” (9)

“Thus, by requiring a showing of extraordinary circumstances to justify the withdrawal of magistrate judge consent, § 636 makes it clear that “withdrawal of consent is not an absolute right.”” (10)

“Further, in advancing this argument Lewis and Holmes turn a blind eye to the facts which reveal that the York County Administration Office and York County Judicial Center clearly consented to our jurisdiction on numerous occasions.” (14)

FACTUAL BACKGROUND

Plaintiffs consented in writing to have a magistrate judge conduct all further proceedings, including trial and entry of final judgment, after the case had already been reassigned from Magistrate Judge Arbuckle to Magistrate Judge Carlson. Two defendants that entered the case later initially acted as though they consented to magistrate judge jurisdiction by filing pleadings seeking dismissal, and subsequently filed express written consents. Plaintiffs challenged the court's jurisdiction only after their complaint had been dismissed on the merits, asserting that their consent was judge-specific and that the later-entering defendants had not expressly consented.

PROCEDURAL HISTORY

Plaintiffs filed a pro se civil-rights complaint on March 11, 2025, arising from ongoing state domestic-relations and protection-from-abuse proceedings. The case was reassigned to Magistrate Judge Carlson, and the parties consented to magistrate judge jurisdiction under 28 U.S.C. § 636(c) and Federal Rule of Civil Procedure 73(b). On September 30, 2025, the court dismissed the complaint on multiple grounds. Plaintiffs then filed motions challenging the court's jurisdiction, including based on the timing and nature of the parties' consents. The court reopened the case to resolve those motions, denied them, and ordered the case closed.

DISPOSITION

dismissed

CASES CITED

- Wellness Int'l Network, Ltd. v. Sharif, 575 U.S. 665, 674, 135 S. Ct. 1932, 1942, 191 L. Ed. 2d 911 (2015)
- Roell v. Withrow, 538 U.S. 580, 582, 123 S. Ct. 1696, 1699, 155 L. Ed. 2d 775 (2003)
- Fellman v. Fireman's Fund Ins. Co., 735 F.2d 55, 58 (2d Cir. 1984)
- Savoca v. United States, 199 F. Supp. 3d 716, 721 (S.D.N.Y. 2016)
- Washington v. Kellwood Co., No. 05 Civ. 10034 (SN), 2015 WL 8073746, at *1 (S.D.N.Y. Dec. 4, 2015)
- Zerega Ave. Realty Corp., 2011 WL 70593, at *3
- Frank v. Cnty. of Hudson, 962 F. Supp. 41, 44 (D.N.J. 1997)
- United States v. Neville, 985 F.2d 992, 1000 (9th Cir. 1993)
- Kirshberger v. United States, 392 F.2d 782 (5th Cir. 1968)
- Cox v. C.H. Masland & Sons, Inc., 607 F.2d 138 (5th Cir. 1979)
- United States v. Mitchell, 777 F.2d 248 (5th Cir. 1985)
- Boykin v. Alabama, 395 U.S. 238, 89 S. Ct. 1709, 23 L. Ed. 2d 274 (1969)
- O'Malley v. United States Fidelity & Guaranty Co., 776 F.2d 494 (5th Cir. 1985)
- Lewis v. Thigpen, 767 F.2d 252 (5th Cir. 1985)
- Gandy v. Alabama, 569 F.2d 1318 (5th Cir. 1978)
- United States v. Lochamy, 724 F.2d 494 (5th Cir. 1984)
- United States v. Unum, 658 F.2d 300 (5th Cir. 1981)
- United States v. Carr, 740 F.2d 339 (5th Cir. 1984)

- Chanofsky v. Chase Manhattan Corp., 530 F.2d 470 (2d Cir. 1976)
- Parks v. Collins, 736 F.2d 313 (5th Cir. 1984)

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