

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA

Steven L. Joffe, M.D. v. U.S. Department of Homeland Security and  
Immigration and Customs Enforcement

Joffe · No. 26-cv-986 (KMM/LIB) · Decided March 31, 2026

SUMMARY

The United States District Court for the District of Minnesota denied Plaintiff Steven L. Joffe’s motion to transfer the case to the District of Columbia. The Court held that, because the matter had already been dismissed and judgment entered, there was no case to transfer. The Court noted that Plaintiff could refile in another district because the dismissal was without prejudice.

CASE DETAILS

|                       |                                                                                                                                                                   |
|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the District of Minnesota                                                                                                        |
| WRITING FOR THE COURT | Katherine M. Menendez                                                                                                                                             |
| JURISDICTION          | United States District Court for the District of Minnesota                                                                                                        |
| DECIDED               | March 31, 2026                                                                                                                                                    |
| DOCKET                | 26-cv-986 (KMM/LIB)                                                                                                                                               |
| DISPOSITION           | other                                                                                                                                                             |
| PROCEDURAL POSTURE    | Plaintiff moved to transfer the action to the United States District Court for the District of Columbia after the action had been dismissed and judgment entered. |
| PRECEDENTIAL VALUE    | nonprecedential district court order                                                                                                                              |
| PARTIES               | Steven L. Joffe, M.D. v. U.S. Department of Homeland Security, Immigration and Customs Enforcement                                                                |

TOPICS

- venue
- subject matter jurisdiction
- civil procedure

PRACTICE AREAS

- civil procedure
- immigration

QUESTIONS PRESENTED

1. Whether a federal district court may transfer a case after the action has been dismissed and judgment entered.
2. Whether filing a new action in another district could independently address the jurisdictional issue identified in the dismissal order.

## HOLDINGS

1. A motion to change venue must be denied when the action has already been dismissed and judgment entered because there is no pending case to transfer.

## KEY QUOTATIONS

*“Because the matter has been dismissed and judgment entered, “there is no case to transfer,””*

## FACTUAL BACKGROUND

Steven L. Joffe, M.D. filed an action against the United States Department of Homeland Security and Immigration and Customs Enforcement. The court dismissed the matter without prejudice and entered judgment. After dismissal, Joffe moved to transfer the case to the federal district court for the District of Columbia.

## PROCEDURAL HISTORY

The District of Minnesota had previously dismissed the action without prejudice and entered judgment. Plaintiff then moved for a change of venue. The court denied the motion because there was no pending case to transfer.

## DISPOSITION

other

## CASES CITED

- Lasher v. Stavis, No. 17-cv-6632 (JPO), 2018 WL 6521586, at \*3 (S.D.N.Y. Dec. 12, 2018)

## OPINION

UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA STEVEN L. JOFFE, M.D., Case No. 26-cv-986 (KMM/LIB) Plaintiff, v. ORDER U.S. DEPARTMENT OF HOMELAND SECURITY AND IMMIGRATION and CUSTOMS ENFORCEMENT, Defendants. Before the Court is Plaintiff Steven L. Joffe, M.D.’s Motion for a Change of Venue “to the federal district court for the District of Columbia.” (Dkt.

12.) Because the matter has been dismissed and judgment entered, “there is no case to transfer,” see Lasher v. Stavis, No. 17-cv-6632 (JPO), 2018 WL 6521586, at \*3 (S.D.N.Y. Dec. 12, 2018) (denying a motion to change venue that was filed after dismissal of the case), and the motion is DENIED.

Although filing the case in a different district will not by itself remedy the jurisdictional issue noted in the Court's Order of Dismissal (Dkt. 10), Plaintiff Joffe may do so if he wishes because the dismissal here was "without prejudice." Dated: March 31, 2026 s/Katherine M. Menendez  
Katherine M. Menendez United States District Judge

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