

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MICHIGAN

Raphael Williams, Jr. v. Private Mortgage Investment, LLC, Series
49

Williams · No. 25-13111 · Decided November 21, 2025

SUMMARY

The United States District Court for the Eastern District of Michigan dismissed without prejudice a pro se plaintiff’s attempted removal of a state landlord-tenant action. The court concluded that the matter fell within the scope of the district court’s automatic referral of bankruptcy-related proceedings to the Bankruptcy Court under E.D. Mich. LR 83.50 and therefore dismissed the case for lack of jurisdiction.

CASE DETAILS

COURT	United States District Court for the Eastern District of Michigan
WRITING FOR THE COURT	Judith E. Levy
JURISDICTION	United States District Court for the Eastern District of Michigan
DECIDED	November 21, 2025
DOCKET	25-13111
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff filed an amended complaint seeking to remove a state landlord-tenant action under 28 U.S.C. § 1452 and requesting referral to the Bankruptcy Court. The district court dismissed the case without prejudice for lack of jurisdiction under E.D. Mich. LR 83.50.
PRECEDENTIAL VALUE	Unknown
PARTIES	Raphael Williams, Jr. v. Private Mortgage Investment, LLC, Series 49

TOPICS

- bankruptcy
- subject matter jurisdiction
- landlord tenant
- civil procedure

PRACTICE AREAS

- Bankruptcy
- Federal jurisdiction
- Landlord-tenant law
- Civil procedure

QUESTIONS PRESENTED

1. Whether the district court had jurisdiction to entertain a matter arising in or related to Plaintiff's Chapter 13 bankruptcy case when E.D. Mich. LR 83.50 automatically referred such matters to the Bankruptcy Court.
2. Whether the case should be dismissed without prejudice because the district court lacked jurisdiction under E.D. Mich. LR 83.50.

HOLDINGS

1. A matter arising in or related to a bankruptcy case falls within E.D. Mich. LR 83.50 and is automatically referred to the Bankruptcy Court unless a district judge withdraws the reference; therefore, the district court lacked jurisdiction to consider this case.
2. The case was dismissed without prejudice pursuant to E.D. Mich. LR 83.50 because the district court lacked jurisdiction.

KEY QUOTATIONS

"Accordingly, the Court lacks jurisdiction in this case."

"For the reasons set forth above, this case is DISMISSED WITHOUT PREJUDICE pursuant to E.D. Mich. LR 83.50."

FACTUAL BACKGROUND

Raphael Williams, Jr. filed an amended pleading concerning a state landlord-tenant action and sought to remove that action under 28 U.S.C. § 1452. He alleged that he had a pending Chapter 13 bankruptcy case in the Eastern District of Michigan and that the state proceeding sought to obtain or enforce possession of, or exercise control over, property of the bankruptcy estate. He also requested referral of the matter to the Bankruptcy Court.

PROCEDURAL HISTORY

On November 17, 2025, Plaintiff filed an amended complaint concerning a state landlord-tenant proceeding and alleged a pending Chapter 13 bankruptcy case. He sought removal of the state proceeding and referral to the Bankruptcy Court for the Eastern District of Michigan. The district court concluded that matters arising under, arising in, or related to a bankruptcy case are automatically referred to the Bankruptcy Court under E.D. Mich. LR 83.50 and dismissed the case without prejudice, finding that there did not appear to be a case to remand.

DISPOSITION

dismissed

CASES CITED

- Omega Tool Corp. v. AlixPartners, LLP, 416 B.R. 315, 319 (E.D. Mich. 2009)

