

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
CALIFORNIA

Solid Income Limited v. EnergyInvest LLC

Solid Income · No. 24-cv-09422-HSG · Decided August 12, 2025

SUMMARY

The United States District Court for the Northern District of California denied administrative motions to relate two December 2024 civil actions to earlier-filed miscellaneous judgment-enforcement proceedings. The court held that the motions were more appropriately directed to the judges handling the earlier-filed matters and denied them without prejudice.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Haywood S. Gilliam, Jr.
JURISDICTION	United States District Court for the Northern District of California
DECIDED	August 12, 2025
DOCKET	24-cv-09422-HSG
DISPOSITION	other
PROCEDURAL POSTURE	Order denying administrative motions to relate cases under Civil Local Rule 3-12.
STANDARD OF REVIEW	The district court has broad discretion in interpreting, applying, and determining the requirements of its local rules and general orders.
PRECEDENTIAL VALUE	District court order; precedential status not stated in the opinion.
PARTIES	Solid Income Limited v. EnergyInvest LLC

TOPICS

- civil procedure
- commercial litigation
- default judgment

PRACTICE AREAS

- civil procedure
- commercial litigation

QUESTIONS PRESENTED

1. Whether the Solid Income–EnergyInvest action should be related to an earlier-filed miscellaneous judgment-enforcement action under Civil Local Rule 3-12.
2. Whether the motion to relate should be directed to the judge handling the earlier-filed matter.

HOLDINGS

1. The motion to relate was denied without prejudice because the earlier-filed miscellaneous judgment-enforcement action was already pending in the district when the present case was filed, making it more appropriate for the motion to be directed to the judge handling the earlier case.

KEY QUOTATIONS

“district courts [have] broad discretion in interpreting, applying, and determining the requirements of their own local rules and general orders.” (1)

FACTUAL BACKGROUND

Solid Income Limited’s action against EnergyInvest LLC and a separate action involving American HomeEnergy LLC were filed on December 26, 2024. EnergyInvest sought to relate the Solid Income–EnergyInvest case to an earlier miscellaneous action filed on September 6, 2024, concerning enforcement of a federal default judgment entered in New York. The earlier action was pending before Magistrate Judge Sallie Kim, while the present action was before Judge Gilliam.

PROCEDURAL HISTORY

Solid Income Limited filed this action against EnergyInvest LLC on December 26, 2024. EnergyInvest moved to relate this case to an earlier miscellaneous action seeking enforcement of a federal default judgment, filed on September 6, 2024, before Magistrate Judge Sallie Kim. The court denied the motion without prejudice, concluding that any relatedness request should be directed to the judge handling the earlier-filed matter.

DISPOSITION

other

REMAND INSTRUCTIONS

The parties may seek a finding of relatedness before Judge Gilliam, but any such request must explain the basis under applicable law and the local rules for reassigning the earlier-filed matter to him.

CASES CITED

- United States v. Gray, 876 F.2d 1411, 1414 (9th Cir. 1989)

OPINION

SOLID INCOME LIMITED v. ENERGYINVEST LLC
PER CURIAM.

1 2 3

4 UNITED STATES DISTRICT COURT

5 NORTHERN DISTRICT OF CALIFORNIA

6 7 SOLID INCOME LIMITED, et al., Case No. 24-cv-09424-HSG 8 Plaintiffs, Re: Dkt. No. 41 9
v. 10 AMERICAN HOMEENERGY LLC, et al., 11 Defendants.

ORDER DENYING ADMINISTRATIVE

12 MOTIONS TO RELATE CASES

13 SOLID INCOME LIMITED,

14 Plaintiff, Case No. 24-cv-09422-HSG 15 v. Re: Dkt. No. 41 16 ENERGYINVEST LLC, et al.,

17 Defendants. 18 19 Solid Income Limited et. al vs. American HomeEnergy LLC et. al, 24-cv-

09424-HSG, and 20 Solid Income Limited vs. EnergyInvest LLC, 24-cv-09422-HSG, are related

cases currently before 21 the Court. Both actions were filed on December 26, 2024. 22 Defendant

American Home Energy asks the Court to find AEC Yield Capital LLC et al v. 23 American Home

Energy, Inc., 24-mc-80225-PHK, which was filed before Magistrate Judge Peter 24 Kang on

September 6, 2024, to be related to Solid Income Limited et. al vs. American 25 HomeEnergy

LLC et. al, 24-cv-09424-HSG, and reassigned to Judge Gilliam. Similarly, 26 Defendant

EnergyInvest LLC asks the Court to find Solid Income Limited vs. EnergyInvest LLC, 27 24-mc-

80224-SK, which was filed before Magistrate Judge Sallie Kim on September 6, 2024, to 1 Judge

Gilliam. The cases before Judge Kim and Judge Kang seek enforcement of default 2 || judgments

entered in federal courts in New York. 3 “[D]istrict courts [have] broad discretion in interpreting,

applying, and determining the 4 || requirements of their own local rules and general orders.”

United States v. Gray, 876 F.2d 1411, 5 1414 (9th Cir. 1989). One intent of Civil Local Rule 3-

12(b) is to direct motions to relate to the 6 || judge with the earliest-filed case. Generally, the cases

at issue are both district court lawsuits, 7 such that the earliest-filed case and the lowest-numbered

case necessarily are the same. But here, g || the miscellaneous-numbered judgment enforcement

actions before Judge Kang and Judge Kim 9 were filed in September 2024, three months before

the cases presently before this Court—24-cv- 19 || 09424-HSG and 24-cv-09422-HSG. 11 The

Court finds that these motions are more appropriately directed to Judge Kang and 2 Judge Kim,

whose cases were already “pending in this district” when the cases before this Court E 13 were

filed. Civ. L.R. 3-12(b). Accordingly, the motions to relate, Dkt. No. 41 in both 24-cv- 14 09424-

HSG and 24-cv-09422-HSG, are DENIED without prejudice to the parties seeking a 5 15 finding

of relatedness explaining the basis under the law and the local rules for reassigning earlier- 16

filed matters to the undersigned. IT IS SO ORDERED. 19 Dated: 8/12/2025 || |

*0 HAYWOOD S. GILLIAM, JR.

71 United States District Judge 22 23 24 25 26 27 28