

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)