

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Elisa Dolores Lewis v. General Motors LLC et al.

Lewis v. General Motors LLC · No. 2:25-cv-07484-SVW-MAR · Decided January 5, 2026

SUMMARY

The Central District of California granted Elisa Dolores Lewis’s motion to remand her action against General Motors LLC to the Superior Court of California, County of Los Angeles. The court held that General Motors did not establish by a preponderance of the evidence that the amount in controversy satisfied the jurisdictional threshold under either diversity jurisdiction or the Magnuson-Moss Warranty Act. The court therefore concluded that it lacked jurisdiction over the Song-Beverly Act and Magnuson-Moss claims.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Stephen V. Wilson
JURISDICTION	U.S. District Court for the Central District of California
DECIDED	January 5, 2026
DOCKET	2:25-cv-07484-SVW-MAR
DISPOSITION	remanded
PROCEDURAL POSTURE	Plaintiff moved to remand an action removed from the Superior Court of California, County of Los Angeles, on diversity-jurisdiction grounds. The district court granted the motion and remanded the case.
STANDARD OF REVIEW	The removing defendant bears the burden of establishing federal subject-matter jurisdiction by a preponderance of the evidence, and removal jurisdiction is subject to a strong presumption against it.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	General Motors LLC v. Elisa Dolores Lewis

TOPICS

- subject matter jurisdiction
- civil procedure
- consumer protection
- restitution
- attorney fees

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the federal court had diversity jurisdiction over the removed action based on an amount in controversy exceeding \$75,000.
2. Whether the Magnuson-Moss Warranty Act claim satisfied the federal jurisdictional threshold of at least \$50,000.
3. Whether the amount in controversy could include restitutionary damages, Song-Beverly civil penalties, and attorney fees in amounts sufficient to establish federal jurisdiction.
4. Whether the court should exercise supplemental jurisdiction over the Song-Beverly claims if the Magnuson-Moss claim supplied federal-question jurisdiction.

HOLDINGS

1. The removing defendant failed to establish by a preponderance of the evidence that the amount in controversy exceeded \$75,000, exclusive of interest and costs.
2. The Magnuson-Moss claim did not satisfy the Act's \$50,000 amount-in-controversy requirement, so the court lacked federal-question jurisdiction over that claim.
3. The court declined to include Song-Beverly civil penalties in the amount-in-controversy calculation because the complaint's willfulness allegations were conclusory and the defendant submitted no additional evidence supporting a civil-penalty award.
4. Although recoverable attorney fees may be included in the amount in controversy, the defendant's unsupported \$5,000 estimate was insufficient, and the record did not support attorney fees of the additional amount needed to reach \$50,000.

KEY QUOTATIONS

“Federal courts are courts of limited jurisdiction.” (Legal Standard)

“Gesturing to a bare request by Plaintiff for civil penalties, with only a conclusory allegation of willfulness, absent facts making willfulness plausible—falls short of that standard.” (Discussion, Part IV.A.ii)

“For the foregoing reasons, Plaintiff’s motion is GRANTED. Accordingly, this case is REMANDED to the California Superior Court, County of Los Angeles for further proceedings.” (Conclusion)

FACTUAL BACKGROUND

Lewis allegedly purchased a 2020 Chevrolet Colorado on or about January 9, 2020, with express warranties from General Motors LLC. The vehicle allegedly manifested warranty-covered defects during the warranty period, and GM allegedly failed to repair, replace, or provide restitution for the vehicle. Lewis sought restitution, actual damages, civil penalties, consequential and incidental damages, attorney fees, costs, prejudgment interest, and other relief under the Song-Beverly Act and the Magnuson-Moss Warranty Act.

PROCEDURAL HISTORY

Lewis filed suit in Los Angeles County Superior Court on March 27, 2025, asserting California Song-Beverly Act and federal Magnuson-Moss Warranty Act claims concerning an allegedly defective vehicle. General Motors removed the action to federal court on August 8, 2025, invoking diversity jurisdiction. Lewis moved to remand on September 5, 2025. The district court held that the removing defendant failed to establish the applicable amount-in-controversy threshold and remanded the case.

DISPOSITION

remanded

REMAND INSTRUCTIONS

The case is remanded to the Superior Court of California, County of Los Angeles, for further proceedings.

CASES CITED

- Nieratko v. Ford Motor Co., 2021 WL 4438397
- Kokkonen v. Guardian Life Insurance Co. of America, 511 U.S. 375 (1994)
- Shoner v. Carrier Corp., 30 F.4th 1144, 1147-48 (9th Cir. 2022)
- United States v. Marks, 530 F.3d 799, 810 (9th Cir. 2008)
- Gaus v. Miles, 980 F.2d 564 (9th Cir. 1992)
- Nishimoto v. Federman-Bachrach & Associates, 903 F.2d 709, 712 n.3 (9th Cir. 1990)
- Syngenta Crop Protection, Inc. v. Henson, 537 U.S. 28, 33 (2002)
- Lopez v. Kia America, Inc., 693 F. Supp. 3d 1063, 1067-68 (C.D. Cal. 2023)
- Canesco v. Ford Motor Co., 570 F. Supp. 3d 872, 898 (S.D. Cal. 2021)
- Wickstrum v. FCA USA LLC, 2021 WL 532257, at *1-2 n.2 (S.D. Cal.)
- D'Amico v. Ford Motor Co., 2020 WL 2614610, at *2-3 (C.D. Cal.)
- Schneider v. Ford Motor Co., 756 F. App'x 699, 701 n.3 (9th Cir. 2018)
- Perez v. General Motors LLC, 2025 WL 3171905, at *2 (C.D. Cal.)
- Brady v. Mercedes-Benz USA, Inc., 243 F. Supp. 2d 1004, 1008-09 (N.D. Cal. 2002)
- Ferguson v. KIA Motors America, Inc., 2021 WL 1997550, at *3 (E.D. Cal.)
- Luna v. BMW of North America, LLC, 2018 WL 2328365, at *4 (S.D. Cal.)
- Lee v. FCA US, LLC, 2016 WL 11516754, at *2 (C.D. Cal.)
- Ronquillo v. BMW of North America, LLC, 2020 WL 6741317, at *3-4 (S.D. Cal.)
- Khachatryan v. BMW of North America, LLC, 2021 WL 927266, at *3 (C.D. Cal.)
- Zawaideh v. BMW of North America, 2018 WL 1805103, at *2 (S.D. Cal.)
- Savall v. FCA US LLC, 2021 WL 1661051, at *3 (S.D. Cal.)
- Garrett v. Mercedes-Benz USA, LLC, 2023 WL 2813564 (C.D. Cal.)
- Fritsch v. Swift Transportation Co. of Arizona, LLC, 899 F.3d 785, 793-94 (9th Cir. 2018)
- Galt G/S v. JSS Scandinavia, 142 F.3d 1150, 1156 (9th Cir. 1998)

- Perkins v. Mercedes-Benz USA, LLC, No. 22-cv-03540-CRB, 2022 WL 9529451, at *6 (N.D. Cal. Oct. 14, 2022)
- Lazorosas, 2025 WL 40483, at *2

Retrieved from lawtools.ai · <https://lawtools.ai/cases/federal/united-states-district-court-for-the-central-district-of-cal/2026/elisa-dolores-lewis-v-general-motors-llc-et-al-5cn5p5kj>