

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MAINE

Marcy Kamin v. SN Servicing Corporation

No. 2:25-cv-00499-SDN (D. Me. Jan. 21, 2026) · No. 2:25-cv-00499-SDN · Decided January 21, 2026

SUMMARY

This is a federal court order granting a plaintiff's motion to remand a putative class action lawsuit to state court. The court found that the defendant, SN Servicing Corporation, failed to meet its burden of proving the amount in controversy exceeded the \$75,000 diversity jurisdiction threshold, as it improperly attempted to aggregate statutory damages from the entire class to meet the requirement for the named plaintiff alone.

CASE DETAILS

COURT	United States District Court for the District of Maine
WRITING FOR THE COURT	Stacey D. Neumann
JURISDICTION	U.S. District Court for the District of Maine
DECIDED	January 21, 2026
DOCKET	2:25-cv-00499-SDN
DISPOSITION	remanded
PROCEDURAL POSTURE	Plaintiff moved to remand a putative class action that Defendant removed from Maine state court on the basis of diversity jurisdiction.
STANDARD OF REVIEW	On a motion to remand, the removing defendant bears the burden of establishing federal subject-matter jurisdiction, including the amount in controversy, by a preponderance of the evidence. Ambiguities concerning federal jurisdiction are resolved in favor of remand.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	SN Servicing Corporation v. Marcy Kamin

TOPICS

- subject matter jurisdiction
- class actions
- civil procedure
- consumer protection

PRACTICE AREAS

- civil procedure
- removal and remand
- subject-matter jurisdiction
- class actions
- consumer protection

QUESTIONS PRESENTED

1. Whether the federal court had diversity subject-matter jurisdiction over the removed putative class action.
2. Whether SN Servicing established by a preponderance of the evidence that the amount in controversy attributable to the named plaintiff exceeded \$75,000.
3. Whether statutory class-member damages under 32 M.R.S. § 11054(1)(C) could be attributed to the named plaintiff for purposes of satisfying the amount-in-controversy requirement.

HOLDINGS

1. Complete diversity existed because SN Servicing was an Alaskan corporation with its principal place of business in Louisiana, while Kamin was a citizen of Maine.
2. The removing defendant did not establish by a preponderance of the evidence that the amount in controversy exceeded \$75,000.
3. Because SN Servicing failed to establish the amount-in-controversy requirement, the court lacked subject-matter jurisdiction and was required to remand the case to state court.

KEY QUOTATIONS

“Federal courts have limited jurisdiction and ordinarily may only hear cases involving a federal question or diversity of citizenship.” (Discussion)

“On the record before me, SN Servicing has not met its burden to show the amount in controversy exceeds \$75,000.” (Discussion)

“When the existence of jurisdiction is ambiguous, the limited nature of federal jurisdiction calls upon me to resolve the ambiguity in favor of remand.” (Discussion)

FACTUAL BACKGROUND

Kamin alleged that, after her 2015 bankruptcy discharge of mortgage debt, SN Servicing pursued improper deficiency judgments, charged post-foreclosure late fees, and issued false statements to discharged borrowers. She brought the claims on behalf of a putative class under the Maine Fair Debt Collection Practices Act and Maine's mortgage-servicer duty of good faith statute. The complaint sought actual and statutory damages and attorney's fees.

PROCEDURAL HISTORY

Kamin filed suit in Cumberland County Superior Court alleging violations of the Maine Fair Debt Collection Practices Act and breach of Maine's mortgage-servicer duty of good faith. SN Servicing timely removed the case to the District of Maine, asserting complete diversity and an amount in controversy exceeding \$75,000. The federal court granted Kamin's motion to remand because SN Servicing failed to establish by a preponderance of the evidence that the amount in controversy satisfied the jurisdictional threshold.

DISPOSITION

remanded

REMAND INSTRUCTIONS

The case was remanded to the state court from which it was removed, Cumberland County Superior Court.

CASES CITED

- Kokkonen v. Guardian Life Ins. Co. of Am., 511 U.S. 375, 377 (1994)
- Finley v. George Weston Bakeries Distrib., Inc., 473 F. Supp. 2d 105, 106 (D. Me. 2007)
- Violette v. Interbake Foods, LLC, No. 1:22-CV-00052, 2022 WL 1590772, at *2 (D. Me. May 19, 2022)
- Doughty v. Hyster New England, Inc., 344 F. Supp. 2d 217, 219 (D. Me. 2004)
- Snyder v. Harris, 394 U.S. 332, 336 (1969)
- Spielman v. Genzyme Corp., 251 F.3d 1, 7 (1st Cir. 2001)
- Sabina v. JP Morgan Chase Bank NA, No. 2:14-CV-160, 2014 WL 5489447, at *4 (D. Me. Oct. 29, 2014)

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