

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

In re James Ezell; In re WMI Liquidating Trust; James Ezell v. JP Morgan Chase Bank N.A., et al.

Ezell · No. Civ. Nos. 25-1158 (GBW), 25-1163 (GBW), and 25-1164 (GBW), consolidated under Civ. No. 25-1158 (GBW); Bankr. Nos. 25-11210 (BLS), 25-11209 (BLS); Adv. No. 25-5104 (BLS) · Decided June 1, 2026

SUMMARY

The United States District Court for the District of Delaware affirmed three Bankruptcy Court dismissal orders involving James Ezell’s voluntary Chapter 7 case, an alleged involuntary petition against the WMI Liquidating Trust, and an adversary proceeding against JPMorgan Chase and others. The court rejected Ezell’s procedural arguments concerning notice, ADA accommodations, Bankruptcy Rule 7052, and Federal Rule of Civil Procedure 60(b)(4). It also rejected his contention that the WMI bankruptcy plan discharged his personal mortgage obligations or otherwise prevented foreclosure-related remedies.

CASE DETAILS

COURT	United States District Court for the District of Delaware
WRITING FOR THE COURT	Gregory B. Williams
JURISDICTION	United States District Court for the District of Delaware
DECIDED	June 1, 2026
DOCKET	Civ. Nos. 25-1158 (GBW), 25-1163 (GBW), and 25-1164 (GBW), consolidated under Civ. No. 25-1158 (GBW); Bankr. Nos. 25-11210 (BLS), 25-11209 (BLS); Adv. No. 25-5104 (BLS)
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appellant appealed three Bankruptcy Court orders dismissing his voluntary Chapter 7 case, a purported involuntary Chapter 7 petition against the WMI Liquidating Trust, and an adversary proceeding seeking declaratory and injunctive relief concerning foreclosure of New Jersey property. The appeals were consolidated, and the District Court reviewed the Bankruptcy Court's final orders under 28 U.S.C. § 158(a)(1).
STANDARD OF REVIEW	The District Court reviews the bankruptcy court's legal determinations de novo, factual findings for clear error, and exercises of discretion for abuse of discretion.

PRECEDENTIAL VALUE	Unknown; memorandum opinion
PARTIES	James Ezell v. JP Morgan Chase Bank N.A., et al.

TOPICS

bankruptcy chapter 7 adversary proceedings appellate jurisdiction ada / disability

PRACTICE AREAS

bankruptcy appellate procedure civil procedure real estate disability law

QUESTIONS PRESENTED

1. Whether the Bankruptcy Court improperly dismissed the three proceedings without a hearing or completion of the requested ADA interactive process.
2. Whether the dismissals contravened Bankruptcy Code §§ 1141 and 524 by disregarding the WMI plan and discharge.
3. Whether Bankruptcy Rule 7052 required separate findings of fact and conclusions of law for the dismissals.
4. Whether the Bankruptcy Court improperly treated Ezell's Rule 60(b)(4) request as a motion for reconsideration or applied the wrong standard.
5. Whether the Bankruptcy Court's conclusion that Ezell and the property had no Delaware connection conflicted with 28 U.S.C. § 1334(e)(1).

HOLDINGS

1. The Bankruptcy Court properly dismissed the voluntary Chapter 7 case, the purported involuntary case, and the adversary proceeding without first holding the scheduled ADA hearing because a bankruptcy court may sua sponte dismiss proceedings when its jurisdiction has been improperly invoked, and Ezell later received notice, a hearing, and an opportunity to present evidence and argument on reconsideration.
2. The WMI Chapter 11 plan and related discharge did not relieve Ezell of his debt obligations under the Note and Mortgage merely because claims against Washington Mutual or its successors were discharged.
3. Rule 7052 did not require separate findings and conclusions because the Bankruptcy Court did not enter a judgment after a trial; it dismissed improperly filed proceedings, and its letter ruling provided ample support for the dismissals.
4. Ezell failed to establish that any dismissal order was void or that the Bankruptcy Court applied an improper standard in denying reconsideration.
5. The Bankruptcy Court's conclusion that Ezell and the property lacked a Delaware connection did not provide a basis to reverse the dismissals, and Ezell identified no error in the Bankruptcy Court's determination that the proceedings could not provide the relief sought.

KEY QUOTATIONS

“A bankruptcy court as a court of equity has the inherent power to dismiss a case when its jurisdiction has been improperly invoked.” (Memorandum § III.A)

“This is a misstatement of law, and the cases and statutes cited by Appellant do not advance his cause.” (Memorandum § III.B)

“For the reasons set forth herein, the Dismissal Orders will be affirmed.” (Memorandum § IV)

FACTUAL BACKGROUND

Ezell owns rental property in Asbury Park, New Jersey, and filed multiple bankruptcy-related proceedings seeking to forestall foreclosure. He asserted that Washington Mutual's Chapter 11 plan discharged his mortgage obligations, although he identified no plan provision relieving him of those obligations. In June 2025, he filed a deficient voluntary Chapter 7 petition, a deficient involuntary petition against the WMI Liquidating Trust, and an adversary proceeding against mortgage-related creditors; the Bankruptcy Court dismissed each proceeding.

PROCEDURAL HISTORY

Ezell filed three proceedings in the Bankruptcy Court on June 24, 2025: a voluntary Chapter 7 petition, a purported involuntary Chapter 7 petition against the WMI Liquidating Trust, and an adversary complaint against JP Morgan Chase and other creditors. The Bankruptcy Court dismissed all three proceedings, denied Ezell's motions for reconsideration after an August 21, 2025 hearing, and issued a letter ruling explaining the procedural and substantive defects. Ezell appealed each dismissal order; the District Court consolidated the appeals and affirmed.

DISPOSITION

affirmed

CASES CITED

- In re Taylor, 913 F.2d 102, 104 (3d Cir. 1990)
- In re Arctic Glacier Int'l, Inc., 255 F. Supp. 3d 534, 545 (D. Del. 2017), aff'd, 901 F.3d 162 (3d Cir. 2018), as amended (Oct. 24, 2018)
- In re Target Indus., Inc., 386 Fed. App'x 233, 235 n.1 (3d Cir. 2010)
- In re Trans World Airlines, Inc., 145 F.3d 124, 130 (3d Cir. 1998)
- Laughlin v. Peck, 552 Fed. App'x 188, 190 (3d Cir. 2014)
- Haines v. Kerner, 404 U.S. 519, 520-21 (1972)
- In re Ezell, Case No. 16-4389 (ICO), Docket No. 214 (Bankr. S.D. Ala. June 5, 2019)
- In re Conf. of Afr. Union First Colored Methodist Protestant Church, 184 B.R. 207, 222-23 (Bankr. D. Del. 1995)
- In re Century City, Inc., 8 B.R. 25, 29 (D.N.J. 1980)
- Travelers Indem. Co. v. Bailey, 557 U.S. 137 (2009)

- Celotex Corp. v. Edwards, 514 U.S. 300 (1995)
- Taggart v. Lorenzen, 587 U.S. 554 (2019)

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