

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Garment District Holdings LLC v. Chauncy Dennis, et al.

Garment District Holdings · No. CV 25-11677-JFW(SKx) · Decided December 10, 2025

SUMMARY

The United States District Court for the Central District of California remanded the action to Los Angeles County Superior Court for lack of subject matter jurisdiction. The court held that the state-law unlawful detainer complaint did not present a federal question, and that the removing defendant failed to establish diversity jurisdiction. The court denied the defendant’s requests to proceed in forma pauperis and for emergency injunctive relief as moot.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	John F. Walter
JURISDICTION	United States District Court for the Central District of California
DECIDED	December 10, 2025
DOCKET	CV 25-11677-JFW(SKx)
DISPOSITION	remanded
PROCEDURAL POSTURE	Defendant Chauncy Dennis removed a California unlawful-detainer action to federal court and asserted that enforcement of a state-court judgment and writ would violate federal due process rights. The district court remanded for lack of subject matter jurisdiction and denied Dennis's pending motions as moot.
STANDARD OF REVIEW	The removing party bears the burden of demonstrating that removal is proper, and removal jurisdiction is strictly construed because federal courts are courts of limited jurisdiction.
PRECEDENTIAL VALUE	Unknown; district court civil minutes order with no reported citation.
PARTIES	Chauncy Dennis, We Don't Do Normal Inc. v. Garment District Holdings LLC

TOPICS

- subject matter jurisdiction
- eviction
- landlord tenant
- civil procedure
- injunctions

PRACTICE AREAS

civil procedure

real estate

landlord tenant

QUESTIONS PRESENTED

1. Whether the federal court had federal-question jurisdiction over a state-law unlawful-detainer action removed by a defendant asserting federal defenses or due-process concerns.
2. Whether the defendant established diversity jurisdiction by alleging the parties' citizenship and the amount in controversy.
3. Whether the removed action should be remanded for lack of subject matter jurisdiction.
4. Whether the defendant's emergency motion for injunctive relief and request to proceed in forma pauperis should be denied as moot after remand.

HOLDINGS

1. The action did not present a federal question because the complaint alleged only a state-law unlawful-detainer claim, and federal jurisdiction cannot be based on anticipated federal defenses or due-process arguments raised by the removing defendant.
2. The defendant could not establish federal subject matter jurisdiction based on the Protecting Tenants at Foreclosure Act's 90-day notice provision.
3. Diversity jurisdiction was not established because the removing defendant failed to allege the citizenship of the parties or the amount in controversy.
4. The action was required to be remanded to Los Angeles County Superior Court because the federal court lacked subject matter jurisdiction.

KEY QUOTATIONS

“Federal courts are courts of limited jurisdiction, having subject matter jurisdiction only over matters authorized by the Constitution and Congress.”

“An unlawful detainer action does not raise a question arising under federal law and so, once removed, must be remanded for lack of jurisdiction.”

“As the party invoking federal jurisdiction, Dennis bears the burden of demonstrating that removal is proper.”

FACTUAL BACKGROUND

Garment District Holdings, LLC brought an unlawful-detainer action under California law against Chauncy Dennis and We Don't Do Normal Inc. in Los Angeles County Superior Court. Dennis removed the action while alleging that enforcement of a state-court judgment and writ would violate federal due process rights, but he did not establish a federal question or diversity jurisdiction. He also filed an emergency motion for a temporary restraining order and preliminary injunction and a request to proceed in forma pauperis.

PROCEDURAL HISTORY

Garment District Holdings, LLC filed an unlawful-detainer complaint against Chauncy Dennis and We Don't Do Normal Inc. in Los Angeles County Superior Court on June 13, 2025. Dennis filed a notice of removal in the federal district court on December 9, 2025, without identifying a valid basis for federal jurisdiction. The district court concluded that neither federal-question nor diversity jurisdiction was established and remanded the action to state court under 28 U.S.C. § 1447(c).

DISPOSITION

remanded

REMAND INSTRUCTIONS

The action was remanded to Los Angeles County Superior Court for lack of subject matter jurisdiction. Dennis's emergency motion for a temporary restraining order and order to show cause for a preliminary injunction, and his request to proceed in forma pauperis, were denied as moot.

CASES CITED

- *Bender v. Williamsport Area Sch. Dist.*, 475 U.S. 534, 541 (1986)
- *Duncan v. Stuetzle*, 76 F.3d 1480, 1485 (9th Cir. 1996)
- *Fifty Assocs. v. Prudential Ins. Co. of Am.*, 446 F.2d 1187, 1190 (9th Cir. 1971)
- *Gaus v. Miles*, 980 F.2d 564, 566 (9th Cir. 1992)
- *Emrich v. Touche Ross & Co.*, 846 F.2d 1190, 1195 (9th Cir. 1988)
- *Cooper v. Washington Mut. Bank*, 2003 WL 1563999, at *2 (N.D. Cal. Mar. 19, 2003)
- *Lender Servicing LLC v. Shokoor*, 2012 WL 2934996, at *4 (E.D. Cal. July 18, 2012)
- *ARCO Env't Remediation, L.L.C. v. Dep't of Health & Env't Quality*, 213 F.3d 1108, 1113 (9th Cir. 2000)

OPINION

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA CIVIL MINUTES -- GENERAL Case No. CV 25-11677-JFW(SKx) Date: December 10, 2025 Title: Garment District Holdings LLC -v- Chauncy Dennis, et al. PRESENT: HONORABLE JOHN F. WALTER, UNITED STATES DISTRICT JUDGE Shannon Reilly None Present Courtroom Deputy Court Reporter ATTORNEYS PRESENT FOR PLAINTIFFS: ATTORNEYS PRESENT FOR DEFENDANTS: None None PROCEEDINGS (IN CHAMBERS): ORDER REMANDING ACTION TO LOS ANGELES COUNTY SUPERIOR COURT; ORDER DENYING AS MOOT DEFENDANT CHAUNCY DENNIS'S REQUEST TO PROCEED IN FORMA PAUPERIS [filed 12/9/25; Docket No. 2]; and ORDER DENYING AS MOOT DEFENDANT CHAUNCY DENNIS'S EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE FOR PRELIMINARY INJUNCTION [filed 12/9/25; Docket No. 4] On June 13, 2025, Plaintiff Garment District Holdings, LLC ("Plaintiff") filed a Complaint for

Unlawful Detainer against Defendants Chauncy Dennis (“Dennis”) and We Don’t Do Normal Inc. (“Normal”) (collectively, “Defendants”) in Los Angeles County Superior Court.

On December 9, 2025, Dennis filed a Notice of Removal. Although Dennis did not allege a basis for the removal, he alleged that enforcement of the “state court judgment and writ would violate [his] federal due process rights.” Federal courts are courts of limited jurisdiction, having subject matter jurisdiction only over matters authorized by the Constitution and Congress.

See *Bender v. Williamsport Area School District*, 475 U.S. 534, 541 (1986). “Because of the Congressional purpose to restrict the jurisdiction of the federal courts on removal, the statute is strictly construed, and federal jurisdiction must be rejected if there is any doubt as to the right of removal in the first instance.” *Duncan v. Stuetzle*, 76 F.3d 1480, 1485 (9th Cir.

1996) (citations and quotations omitted). There is a strong presumption that the Court is without jurisdiction unless the contrary affirmatively appears. See *Fifty Associates v. Prudential Insurance Company of America*, 446 F.2d 1187, 1190 (9th Cir. 1990).

As the party invoking federal jurisdiction, Dennis bears the burden of demonstrating that removal is proper. See, e.g., *Gaus v. Miles*, 980 F.2d 564, 566 (9th Cir. 1992); *Emrich v. Touche Ross & Co.*, 846 F.2d 1190, 1195 (9th Cir. 1988). Dennis has failed to meet his burden of demonstrating that removal is proper. Plaintiff’s Complaint alleges a claim for unlawful detainer under state law. “An unlawful detainer action does not raise a question arising under federal law and so, once removed, must be remanded for lack of jurisdiction.” *Cooper v. Washington Mut.*

Bank, 2003 WL 1563999, *2 (N.D. Cal. Mar. 19, 2003) (internal citation omitted). In addition, “[f]ederal courts have consistently rejected attempts to premise federal subject matter jurisdiction on the 90-day notice provision provided in the [Protecting Tenants at Foreclosure Act].” *Lender Servicing LLC v. Shokoor*, 2012 WL 2934996, at *4 (E.D. Cal. July 18, 2012).

Moreover, to the extent that Dennis alleges there are defenses based on federal law, “the existence of federal jurisdiction depends solely on the plaintiff’s claims for relief and not on anticipated defenses to those claims.” *ARCO Env’t Remediation, L.L.C. v. Dept. of Health and Env’t Quality*, 213 F.3d 1108, 1113 (9th Cir. 2000).

As a result, there is no federal question jurisdiction presented by Plaintiff’s action. Finally, Dennis has failed to allege the citizenship of the parties or the amount in controversy and, as a result, Dennis has failed to demonstrate that diversity jurisdiction exists under 28 U.S.C. §1332.

For all the foregoing reasons, this Court lacks subject matter jurisdiction over this action. Accordingly, this action is REMANDED to Los Angeles County Superior Court for lack of subject matter jurisdiction. See 28 U.S.C. § 1447(c).

In light of the Court remanding this action, Dennis's Emergency Motion for Temporary Restraining Order and Order to Show Cause for Preliminary Injunction (Docket No. 4) and Request to Proceed In Forma Pauperis (Docket No. 2) are DENIED as moot. IT IS SO ORDERED.

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