

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MICHIGAN, SOUTHERN DIVISION

Rochester Advanced Dentistry, PLLC and Jeffrey Haddad, DDS v.
Matthew Wolfe, DDS and Michelle Wolfe

Rochester Advanced Dentistry v. Wolfe · No. 25-cv-13861 · Decided December 9, 2025

SUMMARY

The United States District Court for the Eastern District of Michigan dismissed a petition to confirm an arbitration award for lack of subject matter jurisdiction. Relying on *Badgerow v. Walters*, the court held that federal jurisdiction was absent and dismissed the action without prejudice to refiling in state court.

CASE DETAILS

COURT	United States District Court for the Eastern District of Michigan, Southern Division
WRITING FOR THE COURT	Robert J. White
JURISDICTION	United States District Court for the Eastern District of Michigan, Southern Division
DECIDED	December 9, 2025
DOCKET	25-cv-13861
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioners sought confirmation of an arbitration award under the Federal Arbitration Act. The court ordered petitioners to show cause why the petition should not be dismissed for lack of subject matter jurisdiction; petitioners did not respond.
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	Rochester Advanced Dentistry, PLLC, Jeffrey Haddad, DDS v. Matthew Wolfe, DDS, Michelle Wolfe

TOPICS

- subject matter jurisdiction
- arbitration
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the federal district court had subject matter jurisdiction to confirm the arbitration award under the Federal Arbitration Act and federal-question jurisdiction.

HOLDINGS

1. The district court lacked subject matter jurisdiction to confirm the arbitration award under the circumstances presented.

KEY QUOTATIONS

“Because petitioners did not respond to the show cause order, and since the Court concludes that it indeed lacks subject matter jurisdiction to confirm the arbitration award pursuant to Badgerow v. Walters, 596 U.S. 1 (2022), it is hereby, ORDERED that the petition to confirm the arbitration award is dismissed for lack of subject matter jurisdiction.”

FACTUAL BACKGROUND

Rochester Advanced Dentistry, PLLC and Jeffrey Haddad sought confirmation of a previously issued arbitration award against Matthew Wolfe and Michelle Wolfe. The petition invoked 9 U.S.C. § 9 and asserted federal-question jurisdiction under 28 U.S.C. § 1331. The petitioners did not respond to the court's order to show cause concerning subject matter jurisdiction.

PROCEDURAL HISTORY

Petitioners commenced an action under 9 U.S.C. § 9 to confirm a previously issued arbitration award, asserting the FAA and federal-question jurisdiction under 28 U.S.C. § 1331. The court issued a show-cause order and alternatively invited a voluntary dismissal under Federal Rule of Civil Procedure 41(a)(1)(A)(i). After petitioners failed to respond, the court dismissed the petition without prejudice for lack of subject matter jurisdiction and directed the clerk to close the case.

DISPOSITION

dismissed

CASES CITED

- Badgerow v. Walters, 596 U.S. 1 (2022)

OPINION

Wolfe

PER CURIAM.

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION
ROCHESTER ADVANCED
DENTISTRY, PLLC, and JEFFREY
HADDAD, DDS,

Case No. 25-cv-13861 Petitioners, Honorable Robert J. White v. MATTHEW WOLFE, DDS, and
MICHELLE WOLFE,

Respondents.

ORDER OF DISMISSAL FOR LACK OF SUBJECT MATTER
JURISDICTION

Rochester Advanced Dentistry, PLLC and Jeffrey Haddad (“petitioners”) commenced this action under the Federal Arbitration Act (“FAA”) to confirm a previously issued arbitration award. (ECF No. 1). See 9 U.S.C. § 9. The petition relies upon the FAA’s award-confirmation-provision (9 U.S.C. § 9) and the presence of a federal question (28 U.S.C. § 1331) as the bases for invoking the Court’s subject matter jurisdiction. (ECF No. 1, PageID.3, ¶ 10). The Court ordered petitioners to show cause by Monday, December 8, 2025 as to why the petition should not be dismissed for lack of subject matter jurisdiction. (ECF No. 8, PageID.216). In the alternative, the Court directed petitioners to file a notice of voluntary dismissal, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i), in the event they concluded on their own that subject matter jurisdiction is absent. (Id., PageID.217). Because petitioners did not respond to the show cause order, and since the Court concludes that it indeed lacks subject matter jurisdiction to confirm the arbitration award pursuant to *Badgerow v. Walters*, 596 U.S. 1 (2022), it is hereby, ORDERED that the petition to confirm the arbitration award is dismissed for lack of subject matter jurisdiction. The dismissal is without prejudice to filing the petition in state court. IT IS FURTHER ORDERED that Clerk of the Court is directed to close the case. Dated: December 9, 2025 s/ Robert J. White Robert J. White United States District Judge