

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MICHIGAN

Paula Michelle Watkins v. LaSalle Bank, et al.

Watkins · No. 25-cv-13901 · Decided December 18, 2025

SUMMARY

The United States District Court for the Eastern District of Michigan orders Plaintiff Paula Michelle Watkins to show cause why the case should not be dismissed for lack of subject matter jurisdiction. The court concludes that the complaint does not establish complete diversity because it fails to identify the citizenship of Chicago Title & Trust, and strikes the unsigned first amended complaint under Federal Rule of Civil Procedure 11(a).

CASE DETAILS

COURT	United States District Court for the Eastern District of Michigan
WRITING FOR THE COURT	Judith E. Levy
JURISDICTION	United States District Court for the Eastern District of Michigan
DECIDED	December 18, 2025
DOCKET	25-cv-13901
DISPOSITION	other
PROCEDURAL POSTURE	The pro se plaintiff filed a civil action alleging diversity jurisdiction and later filed an amended complaint. The court sua sponte ordered plaintiff to show cause why the case should not be dismissed for lack of subject matter jurisdiction and struck the unsigned amended complaint.
STANDARD OF REVIEW	Subject-matter jurisdiction may be raised at any time by a party or sua sponte by the court. The court evaluates whether the pleadings adequately establish federal jurisdiction.
PRECEDENTIAL VALUE	unknown

TOPICS

- subject matter jurisdiction
- pleadings
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the original complaint adequately alleged facts establishing complete diversity jurisdiction under 28 U.S.C. § 1332.
2. Whether the unsigned amended complaint complied with Federal Rule of Civil Procedure 11(a) and could remain part of the record.

HOLDINGS

1. The complaint's allegations were insufficient to establish complete diversity because they did not identify Chicago Title & Trust's citizenship; plaintiff was therefore ordered to show cause why the case should not be dismissed for lack of subject matter jurisdiction.
2. The amended complaint was stricken because it lacked the plaintiff's handwritten signature and therefore did not comply with Federal Rule of Civil Procedure 11(a).

KEY QUOTATIONS

"Subject-matter jurisdiction is a threshold matter in all federal cases."

"Challenges to a court's subject-matter jurisdiction "may be raised at any time, by any party or even sua sponte by the court itself.""

"Under [28 U.S.C. § 1332], there must be complete diversity such that no plaintiff is a citizen of the same state as any defendant."

"In a diversity action, 'the plaintiff must state all parties' citizenships such that the existence of complete diversity can be confirmed.'"

FACTUAL BACKGROUND

Paula Michelle Watkins brought a trust and real-property dispute against LaSalle Bank, Diane Odell, and Chicago Title & Trust. Her complaint alleged that the amount in controversy exceeded \$75,000 but did not identify Chicago Title & Trust's citizenship or otherwise provide enough information to determine whether complete diversity existed. Watkins later filed an amended complaint that appeared to address the citizenship deficiency but lacked her handwritten signature.

PROCEDURAL HISTORY

Plaintiff filed the action on December 2, 2025, alleging diversity jurisdiction under 28 U.S.C. § 1332. She filed an amended complaint on December 16, 2025, but did not personally sign it. The district court found that the original complaint did not adequately establish complete diversity, ordered a written response to show cause by January 20, 2026, and struck the amended complaint for noncompliance with Federal Rule of Civil Procedure 11(a).

DISPOSITION

other

CASES CITED

- Steel Co. v. Citizens for a Better Env't, 523 U.S. 83, 101 (1998)
- Franzel v. Kerr Mfg. Co., 959 F.2d 628, 630 (6th Cir. 1992)
- Von Dunser v. Aronoff, 915 F.2d 1071, 1074 (6th Cir. 1990)
- Miller v. Bruenger, 949 F.3d 986, 990 (6th Cir. 2020)
- V & M Star, LP v. Centimark Corp., 596 F.3d 354, 355 (6th Cir. 2010)
- Washington v. Sulzer Orthopedics, Inc., 76 F. App'x 644, 645–46 (6th Cir. 2003)
- Safeco Ins. Co. of Am. v. City of White House, 36 F.3d 540, 545 (6th Cir. 1994)
- Chemical Leaman Tank Lines, Inc. v. Aetna Cas. & Sur. Co., 177 F.3d 210, 222 n.13 (3d Cir. 1999)

OPINION

Watkins

PER CURIAM.

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF MICHIGAN

SOUTHERN DIVISION

Paula Michelle Watkins, Plaintiff, Case No. 25-cv-13901 v. Judith E. Levy United States District Judge LaSalle Bank, et al., Mag. Judge Elizabeth A. Stafford Defendants.

ORDER FOR PLAINTIFF TO SHOW CAUSE WHY THE CASE SHOULD NOT BE DISMISSED FOR LACK OF SUBJECT MATTER JURISDICTION AND ORDER STRIKING PLAINTIFF'S FIRST AMENDED COMPLAINT

This case concerns a trust and real property dispute. On December 2, 2025, pro se Plaintiff Paula Michelle Watkins filed suit against Defendants LaSalle Bank (doing business as Bank of America), Diane Odell, and Chicago Title & Trust. (ECF No. 1.) On December 16, 2025, Plaintiff filed an amended complaint without her handwritten signature. (ECF No. 7.) I. Order for Plaintiff to Show Cause Why the Case Should Not Be Dismissed for Lack of Subject Matter Jurisdiction Plaintiff alleges that the Court has diversity jurisdiction over the case pursuant to 28 U.S.C. § 1332. (ECF No. 1, PageID.3–4.) Plaintiff's allegations, however, are insufficient to show that diversity jurisdiction exists. Subject-matter jurisdiction is a threshold matter in all federal cases. See Steel Co. v. Citizens for a Better Env't, 523 U.S. 83, 101 (1998) (stating that there is no “doctrine of ‘hypothetical jurisdiction’ that enables a court to resolve contested questions of law when its jurisdiction is in doubt”). Challenges to a court's subject-matter jurisdiction “may be raised at any time, by any party or even sua sponte by the court itself.” Franzel v. Kerr Mfg. Co., 959 F.2d 628,

630 (6th Cir. 1992) (footnote omitted) (citing *Von Dunser v. Aronoff*, 915 F.2d 1071, 1074 (6th Cir. 1990)). One way in which a federal court has subject-matter jurisdiction is based on diversity jurisdiction. See *Miller v. Bruenger*, 949 F.3d 986, 990 (6th Cir. 2020). Federal district courts have diversity jurisdiction in civil cases “where the amount in controversy exceeds the sum or value of \$75,000, exclusive of interests and costs, and is between . . . citizens of different States.” 28 U.S.C. § 1332(a)(1). “Under [28 U.S.C. § 1332], there must be complete diversity such that no plaintiff is a citizen of the same state as any defendant.” *V & M Star, LP v. Centimark Corp.*, 596 F.3d 354, 355 (6th Cir. 2010); see *Washington v. Sulzer Orthopedics, Inc.*, 76 F. App’x 644, 645 (6th Cir. 2003) (stating that “complete diversity” requires “that no party share citizenship with any opposing party” (citing *Safeco Ins. Co. of Am. v. City of White House*, 36 F.3d 540, 545 (6th Cir. 1994))). “In a diversity action, ‘the plaintiff must state all parties’ citizenships such that the existence of complete diversity can be confirmed.’” *Washington*, 76 F. App’x at 645–46 (quoting *Chemical Leaman Tank Lines, Inc. v. Aetna Cas. & Sur. Co.*, 177 F.3d 210, 222 n.13 (3d Cir. 1999)). Here, the amount-in-controversy requirement is met. The complaint states that the amount in controversy exceeds \$75,000. (ECF No. 1, PageID.5.) But the Court cannot determine whether the complete- diversity requirement is met based on the complaint’s allegations. The complaint does not identify Chicago Title & Trust’s citizenship. Plaintiff used the pro se complaint form (MIED ProSe 1 (Rev 5/16) Complaint for a Civil Case) (ECF No. 1.) If the basis for jurisdiction is diversity of citizenship, Plaintiff must complete Part B of the “Basis for Jurisdiction” section. (Id. at PageID.3–4.) At the bottom of the page, the form reads “[i]f more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.” (Id.) Plaintiff has failed to attach an additional page providing Chicago Title & Trust’s citizenship. As a result, the Court cannot determine whether there is complete-diversity based on the complaint’s allegations. For the reasons explained above, Plaintiff’s allegations in the complaint are insufficient to show subject matter jurisdiction under diversity jurisdiction. Accordingly, the Court orders Plaintiff to show cause, in writing, why this case should not be dismissed for lack of subject matter jurisdiction. Plaintiff’s response is due on or before January 20, 2026. II. Order Striking Plaintiff’s Amended Complaint As noted, Plaintiff did not sign the amended complaint. (ECF No. 7.) Federal Rule of Civil Procedure 11(a) provides in relevant part that “[e]very pleading, written motion, and other paper must be signed by . . . a party personally if the party is unrepresented.” Fed. R. Civ. P. 11(a). Although the amended complaint appears to cure the citizenship defect noted above, it is unsigned and therefore does not comply with the signature requirement of Rule 11(a). Accordingly, the amended complaint is stricken. Plaintiff may refile an amended complaint that contains her handwritten signature. Any complaint Plaintiff decides to file must also address the deficiency regarding jurisdiction noted above. For reasons stated above, the Court orders:

(1) Plaintiff to show cause, in writing, why this case should not be dismissed for lack of subject matter jurisdiction. Plaintiff’s response is due on or before January

20, 2026.

(2) The amended complaint (ECF No. 7) is STRICKEN and not part of the record. If Plaintiff fails to comply with this order, the case may be dismissed for failure to prosecute pursuant to Eastern District of Michigan Local Rule 41.2 and for lack of subject matter jurisdiction (28 U.S.C. § 1332(c)(1)). IT IS SO ORDERED. Dated: December 18, 2025 s/Judith E. Levy Ann Arbor, Michigan JUDITH E. LEVY United States District Judge

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was served upon counsel of record and any unrepresented parties via the Court's ECF System to their respective email or first-class U.S. mail addresses disclosed on the Notice of Electronic Filing on December 18, 2025. s/William Barkholz
WILLIAM BARKHOLZ

Case Manager