

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)

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