UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF CALIFORNIA

Jon Lewis v. Synchrony Bank

No. 2:24-cv-0110-DC-JDP (PS) (E.D. Cal. Oct. 21, 2025) · No. 2:24-cv-0110-DC-JDP (PS) · Decided October 21, 2025

SUMMARY

The document contains findings and recommendations by a United States magistrate judge regarding plaintiff Jon Lewis's motion to alter or amend a judgment dismissing his claims against Synchrony Bank. The magistrate judge recommends denying the motion because plaintiff identified no newly discovered evidence, clear error, intervening change in law, or other basis for reconsideration.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Jeremy D. Peterson
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	October 21, 2025
DOCKET	2:24-cv-0110-DC-JDP (PS)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved under Federal Rules of Civil Procedure 59(e) or 60(b) to alter or amend a judgment dismissing his federal claims without leave to amend and declining supplemental jurisdiction over his state-law claims. The magistrate judge recommended denial of the motion.
STANDARD OF REVIEW	A motion to alter or amend judgment under Rule 59(e) is an extraordinary remedy available only upon newly discovered evidence, clear error, or an intervening change in controlling law. Reconsideration may also be sought under Rule 60(b), subject to its applicable grounds.
PRECEDENTIAL VALUE	Unpublished, nonprecedential magistrate judge findings and recommendations
PARTIES	Jon Lewis v. Synchrony Bank

TOPICS

motion for reconsideration civil procedure pleadings

PRACTICE AREAS

civil procedure federal courts

QUESTIONS PRESENTED

1. Whether plaintiff established a basis under Federal Rule of Civil Procedure 59(e) or 60(b) to alter or amend the judgment.
2. Whether defense counsel was required to verify authority to represent Synchrony Bank through a letter of authority, power of attorney, corporate resolution, or similar instrument.

HOLDINGS

1. A motion to alter or amend judgment should be denied where the movant identifies no newly discovered evidence, clear error, intervening change in controlling law, or other valid basis for reconsideration.
2. An attorney admitted to practice before the court is not required to provide a letter of authority, power of attorney, corporate resolution, or similar instrument verifying authorization to represent a client.

KEY QUOTATIONS

> *"A grant of a motion to amend or alter judgment under Rule 59(e) is an "extraordinary remedy, to be used sparingly in the interests of finality and conservation of judicial resources.""* (at 1)

> *"Plaintiff does not identify any new evidence, clear error, or intervening change in law."* (at 1)

> *"Although an attorney must be granted admission to practice before this court, there is no requirement that counsel verify authorization to represent his or her client."* (at 2)

FACTUAL BACKGROUND

The district court had adopted findings and recommendations dismissing Lewis's second amended complaint without leave to amend and had entered judgment. Lewis's motion to alter or amend did not identify newly discovered evidence, clear error, or an intervening change in controlling law. Instead, he argued that the judgment was void because defense counsel had not produced a letter of authority, power of attorney, corporate resolution, or similar instrument establishing authorization to represent Synchrony Bank.

PROCEDURAL HISTORY

On May 14, 2025, the magistrate judge recommended granting defendant's motion to dismiss, dismissing plaintiff's federal claims without leave to amend, and declining supplemental jurisdiction over the state-law claims. On September 17, 2025, the district court adopted those findings and recommendations, dismissed the second amended complaint without leave to amend, and entered judgment. Plaintiff then filed the motion to alter or amend the judgment addressed here.

DISPOSITION

other

CASES CITED

- Sch. Dist. Number 1J, Multnomah County v. ACandS, Inc., 5 F.3d 1255, 1262 (9th Cir. 1993)
- Kona Enters. v. Estate of Bishop, 229 F.3d 877, 890 (9th Cir. 2000)
- McDowell v. Calderon, 197 F.3d 1253, 1255 (9th Cir. 1999) (en banc)
- 389 Orange St. Partners v. Arnold, 179 F.3d 656, 665 (9th Cir. 1999)
- Turner v. Duncan, 158 F.3d 449, 455 (9th Cir. 1998)
- Martinez v. Ylst, 951 F.2d 1153 (9th Cir. 1991)

INSTRUCTIONS FOR AN AI ASSISTANT