

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
ALABAMA, NORTHERN DIVISION

David Rentz v. Tristen Hart, et al.

Rentz · No. Civil Action No. 26-00005-KD-B · Decided January 27, 2026

SUMMARY

The court orders Defendant EDKO, LLC to file a second amended disclosure statement identifying each member or partner in the relevant unincorporated entities and the state citizenship of each relevant natural person. The order explains that the prior disclosure failed to comply with diversity-jurisdiction requirements and directs EDKO, LLC to use the court’s standard disclosure statement form by January 30, 2026.

CASE DETAILS

COURT	United States District Court for the Southern District of Alabama, Northern Division
WRITING FOR THE COURT	Sonja F. Bivins
JURISDICTION	United States District Court for the Southern District of Alabama, Northern Division
DECIDED	January 27, 2026
DOCKET	Civil Action No. 26-00005-KD-B
DISPOSITION	other
PROCEDURAL POSTURE	The district court reviewed Defendant EDKO, LLC's amended corporate disclosure statement after previously ordering EDKO to adequately disclose its citizenship for purposes of diversity jurisdiction.
STANDARD OF REVIEW	Review of the adequacy of a corporate disclosure statement for determining diversity jurisdiction.
PRECEDENTIAL VALUE	Unknown

TOPICS

- subject matter jurisdiction
- limited liability companies
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether EDKO, LLC's amended disclosure statement adequately identified the entity's members and the citizenship of all relevant members or partners for purposes of diversity jurisdiction.
2. What corrective disclosures EDKO, LLC was required to make to establish its citizenship.

HOLDINGS

1. The amended disclosure statement was inadequate because it failed to specifically identify EDKO, LLC's members, the members or partners of other relevant unincorporated entities in the ownership chain, and the state citizenship of relevant natural persons.
2. EDKO, LLC was ordered to file a second amended disclosure statement identifying the required members, partners, and citizenship information and using the Court's standard disclosure statement form.

KEY QUOTATIONS

“to sufficiently identify the citizenship of an unincorporated entity or association such as a limited liability company, a party must identify each member of the LLC and the citizenship of that member.” (Doc. 7 at 1-2)

“Accordingly, Defendant EDKO, LLC is ORDERED to file a second amended disclosure statement on or before January 30, 2026” (Order at 2-3)

FACTUAL BACKGROUND

Defendant EDKO, LLC filed an amended disclosure statement in response to an order requiring it to establish its citizenship for diversity-jurisdiction purposes. The statement apparently misidentified EDKO, LLC as a corporation, used ownership terminology instead of identifying members or partners, failed to identify the members of EDKO Intermediate Holdings, LLC and EDKO Holdings LLC, and identified residency rather than citizenship for relevant individuals. The Court also noted that the disclosure was inconsistent with the notice of removal and Louisiana Secretary of State records identifying EDKO as a limited liability company.

PROCEDURAL HISTORY

The action was removed to federal court based on diversity jurisdiction. The Court previously ordered EDKO, LLC to file an amended disclosure statement identifying the members of EDKO and the members or partners of any relevant unincorporated entities, together with each individual's state of citizenship. After reviewing EDKO's amended statement, the Court found it deficient and ordered EDKO to file a second amended disclosure statement by January 30, 2026, using the Court's standard form.

DISPOSITION

other

CASES CITED

- Rolling Greens MHP, L.P. v. Comcast SCH Holdings L.L.C., 374 F.3d 1020, 1022 (11th Cir. 2004) (per curiam)
- Purchasing Power, LLC v. Bluestem Brands, Inc., 851 F.3d 1218, 1220 (11th Cir. 2017)
- Taylor v. Appleton, 30 F.3d 1365, 1367 (11th Cir. 1994)

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