

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Nock v. Spring Energy RRH, LLC, d/b/a Spring Power & Gas, RRH
Energy Services, LLC, and Richmond Road Holdings, LLC

Nock · No. RDB-25-2809 · Decided December 17, 2025

SUMMARY

The United States District Court for the District of Maryland denied Robert Nock’s motion to consolidate this putative class action with a related TCPA case, Nock v. PalmCo Administration, LLC. The court concluded that consolidation would not promote judicial economy or fairness because the two cases were at substantially different stages of litigation and consolidation would delay resolution of the pending summary-judgment motion.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Richard D. Bennett
JURISDICTION	United States District Court for the District of Maryland
DECIDED	December 17, 2025
DOCKET	RDB-25-2809
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff in a putative Telephone Consumer Protection Act class action moved under Federal Rule of Civil Procedure 42(a) to consolidate this action with a related TCPA action. The court denied the motion.
STANDARD OF REVIEW	A motion to consolidate under Federal Rule of Civil Procedure 42(a) is committed to the district court's substantial discretion. The court considers whether the actions share common questions of law or fact, whether consolidation would advance judicial economy and convenience, and whether consolidation would prejudice the parties.
PRECEDENTIAL VALUE	Unpublished district court memorandum opinion; persuasive authority only.

TOPICS

civil procedureclass actionsjoindersummary judgmentdiscovery dispute

PRACTICE AREAS

civil procedure

consumer protection

class actions

Telephone Consumer Protection Act

QUESTIONS PRESENTED

1. Whether the action and Nock v. PalmCo Administration, LLC shared common questions of law or fact permitting consolidation under Federal Rule of Civil Procedure 42(a).
2. Whether consolidation would advance judicial economy and convenience without causing unfair prejudice, delay, or unnecessary expense.

HOLDINGS

1. The court denied consolidation because combining the cases would undermine Rule 42(a)'s purposes of fairness and judicial economy by causing substantial delay and unnecessary cost, particularly to the defendants in the more advanced action.

KEY QUOTATIONS

“The critical question for the district court in the final analysis [is] whether the specific risks of prejudice and possible confusion [a]re overborne by the risk of inconsistent adjudications of common factual and legal issues, the burden on parties, witnesses and available judicial resources posed by multiple lawsuits, the length of time required to conclude multiple suits as against a single one, and the relative expense to all concerned of the single- trial, multiple-trial alternatives.” (Standard of Review)

“As the Supreme Court of the United States recently stated, “[d]istrict courts enjoy substantial discretion in deciding whether and to what extent to consolidate cases.”” (Standard of Review)

FACTUAL BACKGROUND

Nock alleged that the Spring Energy Defendants and defendants in a related action separately hired the same Pakistan-based call center for telemarketing campaigns occurring several days apart in 2021. He alleged that the campaigns generated unsolicited and deceptive calls violating the TCPA and corresponding Maryland law. By the time of the motion, this action had completed fact discovery and had a fully briefed summary-judgment motion, while the related action remained in discovery with discovery disputes pending.

PROCEDURAL HISTORY

Nock originally filed this action in the Southern District of New York on February 8, 2023. Judge Lehrburger transferred the action to the District of Maryland on July 22, 2025. Nock then sought consolidation with Nock v. PalmCo Administration, LLC, which was still in discovery while this case had completed fact discovery and had a fully briefed summary-judgment motion. A third related action, Savada v. RRH Energy Services, LLC, had previously been dismissed under the first-to-file rule.

DISPOSITION

other

CASES CITED

- Savada v. RRH Energy Servs., LLC, --- F. Supp. 3d ---, ---, RDB-25-1156, 2025 WL 3018773, at *1-*2, *4 (D. Md. Oct. 29, 2025)
- Mims v. Arrow Fin. Servs., LLC, 565 U.S. 368, 377 (2012)
- Am. Well Works Co. v. Layne & Bowler Co., 241 U.S. 257, 260 (1916)
- Nock v. Spring Energy RRH, LLC, 23-CV-1042, 2025 WL 2046196, at *1-*2 (S.D.N.Y. July 22, 2025)
- Arnold v. E. Air Lines, Inc., 681 F.2d 186, 192 (4th Cir. 1982), rev'd on other grounds, 712 F.2d 899 (4th Cir. 1983) (en banc)
- Campbell v. Bos. Sci. Corp., 882 F.3d 70, 74, 76 (4th Cir. 2018)
- Laughlin v. Biomet Inc., ELH-14-1645, 2020 WL 1307397, at *6-*9 (D. Md. Mar. 18, 2020)
- Harris v. Biomet Orthopedics, LLC, ELH-18-3924, 2019 WL 6117358, at *6-*9 (D. Md. Nov. 18, 2019)
- Hall v. Hall, 584 U.S. 59, 77 (2018)
- Miranda v. Homefix Custom Remodeling Corp., TDC-22-3190, 2023 WL 5959828, at *1, *3 (D. Md. Sept. 13, 2023)
- CSX Transp., Inc. v. Alban Waste, LLC, JKB-13-1770, 2014 WL 1340041, at *2 (D. Md. Apr. 2, 2014)

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