

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Deonca Williams v. American Arbitration Association Inc., et al.

Williams · No. Civil Action No. 25-12412 (JXN)(CF) · Decided January 13, 2026

SUMMARY

The United States District Court for the District of New Jersey administratively terminated and closed the action as duplicative of a previously filed case involving Citibank, the American Arbitration Association, and the same underlying arbitration dispute. The court stated that the plaintiff could seek to amend the earlier action to add the additional defendants and related allegations.

CASE DETAILS

COURT	United States District Court for the District of New Jersey
WRITING FOR THE COURT	Julien Xavier Neals
JURISDICTION	United States District Court for the District of New Jersey
DECIDED	January 13, 2026
DOCKET	Civil Action No. 25-12412 (JXN)(CF)
DISPOSITION	other
PROCEDURAL POSTURE	A pro se plaintiff filed a complaint and an application to proceed in forma pauperis. On sua sponte screening, the court determined that the action duplicated a previously filed and pending action involving the same subject matter and nearly identical claims.
STANDARD OF REVIEW	Sua sponte screening under 28 U.S.C. § 1915(e)(2), including whether the action is frivolous, malicious, or fails to comply with applicable pleading standards.
PRECEDENTIAL VALUE	Unpublished memorandum order; nonprecedential

TOPICS

- civil procedure
- pleadings
- arbitration
- consumer protection
- commercial litigation

PRACTICE AREAS

- civil procedure
- arbitration
- consumer protection
- commercial litigation

QUESTIONS PRESENTED

1. Whether the court could terminate a complaint as duplicative during in forma pauperis screening.
2. Whether the complaint should be administratively terminated because it duplicated a previously filed pending action involving the same subject matter and substantially identical claims.
3. Whether plaintiff could pursue claims against additional defendants by moving to amend the previously filed action.

HOLDINGS

1. A district court may dismiss or otherwise terminate a duplicative complaint as part of its authority to administer its docket, including during screening under 28 U.S.C. § 1915(e).
2. A plaintiff seeking to assert claims against additional defendants arising from the same common set of facts may seek to amend the previously filed action rather than maintain a duplicative separate case.

KEY QUOTATIONS

“As part of its general power to administer its docket, a district court may dismiss a duplicative complaint” (629 F. App'x at 198)

“prohibiting a plaintiff from “maintain[ing] two separate actions involving the same subject matter at the same time in the same court and against the same defendant”” (563 F.2d at 70)

“Plaintiffs generally must bring all claims arising out of a common set of facts in a single lawsuit, and federal district courts have discretion to enforce that requirement as necessary ‘to avoid duplicative litigation.’” (567 U.S. at 34)

FACTUAL BACKGROUND

The complaint arose from Citibank's collection action in the Superior Court of New Jersey concerning a Sears Mastercard credit account and the parties' subsequent arbitration through the American Arbitration Association. Plaintiff alleged that Citibank and the AAA were working together to compel arbitration and deny her the opportunity to have the issues heard in federal court. The court found that the complaint duplicated a pending action against Citibank involving the same arbitration, subject matter, and nearly identical claims and factual allegations.

PROCEDURAL HISTORY

Plaintiff filed this federal action against Citibank N.A. and the American Arbitration Association concerning a state-court collection action and related arbitration. The court screened the complaint under 28 U.S.C. § 1915(e) (2), found it duplicative of *Williams v. Citibank N.A. et al.*, Civil Action No. 25-01044 (MCA)(JBC), administratively terminated the action, directed that the order be docketed for informational purposes in the earlier case, and closed this matter.

DISPOSITION

other

CASES CITED

- Brown v. Sage, 941 F.3d 655, 660, 662 (3d Cir. 2019)
- Fabrics v. City of New Brunswick, 629 F. App'x 196, 198 (3d Cir. 2015)
- Colorado River Water Conservation District v. United States, 424 U.S. 800, 817 (1976)
- Walton v. Eaton Corp., 563 F.2d 66, 70 (3d Cir. 1977) (en banc)
- Gause v. Court of Common Pleas, 571 F. App'x 144, 145 (3d Cir. 2014)
- Pittman v. Moore, 980 F.2d 994, 994-95 (5th Cir. 1993)
- Elgin v. Department of the Treasury, 567 U.S. 1, 34 (2012)

OPINION

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY DEONCA WILLIAMS, Civil Action No. 25-12412 (JXN)(CF) Plaintiff, v. AMERICAN ARBITRATION MEMORANDUM ORDER ASSOCIATION INC., et al., Defendants. NEALS, District Judge WHEREAS, Plaintiff Sharita T. Patterson (“Plaintiff”), appearing pro se, has filed a Complaint against Citibank N.A. (“Citibank”) and the American Arbitration Association (“AAA”) (collectively, “Defendants”) (see Complaint (“Compl.”), ECF No. 1); and WHEREAS, Plaintiff’s claims arise from a collection action Citibank filed in the Superior Court of New Jersey, Law Division, Special Civil Part, Hudson County, regarding the Sears Mastercard credit account Plaintiff had with Citibank and the subsequent arbitration of this matter by the parties with the AAA.

(See generally Compl.) Plaintiff alleges that Defendants are “working together to ignore all evidence and demand arbitration to deny Plaintiff’s rights to have issues heard in a Federal Court” (Compl. at *3)¹; and WHEREAS, in submitting an IFP application, the Complaint is subject to sua sponte screening and may be dismissed if, among other things, the action is frivolous or malicious or fails 1 Page numbers preceded by an asterisk (*) reflect CM/ECF pagination. to comply with the proper pleading standards.”² See 28 U.S.C. § 1915(e)(2)(B)(i)–(iii); Brown, 941 F.3d at 662.

WHEREAS, it appears to the Court that Plaintiff’s Complaint is duplicative of a currently pending case Plaintiff brought against Citibank, involving the same subject matter, challenging the same arbitration, and raising nearly identical claims and factual allegations, see Williams v. Citibank N.A. et al, Civil Action No: 25-01044 (MCA)(JBC); and WHEREAS, “[a]s part of its general power to administer its docket, a district court may dismiss a duplicative complaint,” Fabrics v. City of New Brunswick, 629 F. App’x 196, 198 (3d Cir.

2015) (quoting Colorado River Water Conservation Dist. v. United States, 424 U.S. 800, 817 (1976)) (internal quotations omitted); (citing Walton v. Eaton Corp., 563 F.2d 66, 70 (3d Cir. 1977)) (en banc) (prohibiting a plaintiff from “maintain[ing] two separate actions involving the same subject matter at the same time in the same court and against the same defendant”); Gause v. Court of Common Pleas, 571 F. App’x 144, 145 (3d Cir.

2014) (a district court may properly dismiss duplicative complaints under § 1915(e)) (citing *Pittman v. Moore*, 980 F.2d 994, 994–95 (5th Cir. 1993)); and WHEREAS, to the extent Plaintiff wishes to sue the other defendants they have named in this matter, like the AAA, Plaintiff may move to amend their complaint in the previously filed action to add those defendants and factual allegations against them.

See *Elgin v. Dep't of Treasury*, 567 U.S. 1, 34 (2012) (“Plaintiffs generally must bring all claims arising out of a common set of facts in a single lawsuit, and federal district courts have discretion to enforce that requirement as 2 “[A] court has the discretion to consider the merits of a case and evaluate an IFP application in either order or even simultaneously.” *Brown v. Sage*, 941 F.3d 655, 660 (3d Cir.

2019). necessary ‘to avoid duplicative litigation.’”) (Alito, J., dissenting) (quoting *Colorado River*, 424 U.S. at 817). Accordingly, IT IS on this 13th day of January 2026, ORDERED that this action is ADMINISTRATIVELY TERMINATED as duplicative of Civil Action No. 25-01044; it is further ORDERED that the Clerk of the Court shall docket this Order for informational purposes only in Civil Action No. 25-01044; and it is further ORDERED that the Clerk of the Court shall CLOSE this matter. _____ JULIEN XAVIER NEALS United States District Judge