

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.

OPINION

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

PER CURIAM.

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