

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF  
CALIFORNIA

Jean-Paul Prentice, et al. v. Wells Fargo Bank NA., et al.

Prentice v. Wells Fargo Bank · No. 2:25-cv-01276-DJC-CKD (PS) · Decided December 11, 2025

SUMMARY

The United States District Court for the Eastern District of California recommends granting defendants’ motions to dismiss a Truth in Lending Act action arising from a home-improvement contract and financing arrangement. The court concludes that the claims are barred by res judicata because they involve the same primary right, parties or parties in privity, and a final small-claims judgment on the merits, and recommends dismissal without leave to amend.

CASE DETAILS

|                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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| COURT              | United States District Court for the Eastern District of California                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| JURISDICTION       | United States District Court for the Eastern District of California                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| DECIDED            | December 11, 2025                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| DOCKET             | 2:25-cv-01276-DJC-CKD (PS)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| DISPOSITION        | other                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| PROCEDURAL POSTURE | Plaintiffs proceeding pro se filed an action under the Truth in Lending Act. Defendants moved to dismiss under Federal Rule of Civil Procedure 12(b)(6), asserting claim preclusion based on a prior Sacramento County Superior Court small-claims judgment. The magistrate judge issued an order on requests for judicial notice and plaintiffs' motion for trial, and findings and recommendations recommending dismissal without leave to amend.                                                                                             |
| STANDARD OF REVIEW | On a Rule 12(b)(6) motion, the court accepts well-pleaded allegations as true and construes them in the plaintiff’s favor, but conclusory statements and formulaic recitations do not suffice. The court may consider materials incorporated into or relied upon by the complaint and matters of public record. Claim preclusion may be resolved on a motion to dismiss when it does not present disputed factual issues. Pro se pleadings are liberally construed, and leave to amend is ordinarily provided unless amendment would be futile. |
| PRECEDENTIAL VALUE | nonprecedential                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

## PARTIES

Jean-Paul Prentice, Virginia G. Prentice v. Wells Fargo Bank N.A.,  
Leaf Filter North, LLC, Leaf Filter International, Inc.

## TOPICS

res judicata

motions to dismiss

truth in lending

consumer protection

civil procedure

## PRACTICE AREAS

civil procedure

consumer protection

contracts

## QUESTIONS PRESENTED

1. Whether Wells Fargo could join Leaf Filter's motion to dismiss.
2. Whether the court could take judicial notice of filings from plaintiffs' prior small-claims action and whether plaintiffs' separate request for judicial notice should be granted.
3. Whether plaintiffs' Truth in Lending Act claims were barred by California claim preclusion based on the prior small-claims judgment.
4. Whether the small-claims judgment was final and on the merits despite the absence of a right to appeal.
5. Whether plaintiffs should be granted leave to amend.

## HOLDINGS

1. The court permitted Wells Fargo to join Leaf Filter's motion to dismiss because the allegations and asserted grounds were substantially similar and separate briefing would be redundant.
2. Plaintiffs' federal claims were barred by res judicata because they involved the same primary right and injury, the same defendants, and a prior final judgment on the merits.
3. Leave to amend was properly denied because the claims were barred by res judicata and amendment would be futile.

## KEY QUOTATIONS

*“Res judicata “precludes a party from relitigating (1) the same claim, (2) against the same party, (3) when that claim proceeded to a final judgment on the merits in a prior action.”” (at 8)*

*“A small claims court plaintiff, taking advantage of the speedy, inexpensive procedures and other benefits of that court, accepts all of its attending disadvantages such as the denial of the right to an attorney or to an appeal.” (at 9)*

## FACTUAL BACKGROUND

Plaintiffs alleged that Leaf Filter deprived them of the Truth in Lending Act rescission period and failed to provide the required rescission notices while scheduling work during that period. They alleged that Leaf Filter received approximately \$7,999 financed through Wells Fargo, refused to rescind after notice, and that Wells Fargo continued collection efforts. Before filing the federal action, Jean-Paul Prentice brought a substantially

similar small-claims action alleging deprivation of the cancellation period and seeking approximately \$7,990; the small-claims court entered judgment against him on March 26, 2025.

## PROCEDURAL HISTORY

Plaintiffs filed the federal complaint on May 5, 2025. Leaf Filter moved to dismiss and sought judicial notice of filings from plaintiffs' prior small-claims action; Wells Fargo joined the motion. After briefing, the court granted Leaf Filter's request for judicial notice, denied plaintiffs' request, denied plaintiffs' motion for trial as moot, and recommended granting defendants' motions to dismiss without leave to amend. The findings and recommendations were referred to the assigned district judge under 28 U.S.C. § 636(b)(1), subject to objections.

## DISPOSITION

other

## REMAND INSTRUCTIONS

The findings and recommendations were submitted to the assigned district judge for review under 28 U.S.C. § 636(b)(1). Parties were given fourteen days to file objections.

## CASES CITED

- *Balistreri v. Pacifica Police Department*, 901 F.2d 696, 699 (9th Cir. 1990)
- *Hishon v. King & Spalding*, 467 U.S. 69, 73 (1984)
- *Love v. United States*, 915 F.2d 1242, 1245 (9th Cir. 1990)
- *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009)
- *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544, 555, 570 (2007)
- *Drawsand v. F.F. Properties, L.L.P.*, 866 F. Supp. 2d 1110, 1125 (N.D. Cal. 2011)
- *Scott v. Kuhlmann*, 746 F.2d 1377, 1378 (9th Cir. 1984)
- *Lee v. City of Los Angeles*, 250 F.3d 668, 688-89 (9th Cir. 2001)
- *Hebbe v. Pliler*, 627 F.3d 338, 342 n.7 (9th Cir. 2010)
- *Bennett v. Medtronic, Inc.*, 285 F.3d 801, 803 n.2 (9th Cir. 2002)
- *Apothio, LLC v. Kern County*, 599 F. Supp. 3d 983, 1002 (E.D. Cal. 2022)
- *United States ex rel. Ambrosecchia v. Paddock Laboratories, LLC*, 855 F.3d 949, 956 (8th Cir. 2017)
- *Grover Products LLC v. Air Horns of Texas, LLC*, 2025 WL 2855904, at \*7 (C.D. Cal. Oct. 6, 2025)
- *Tatung Co., Ltd. v. Shu Tze Hsu*, 217 F. Supp. 3d 1138, 1151 (C.D. Cal. 2016)
- *White v. City of Pasadena*, 671 F.3d 918, 926 (9th Cir. 2012)
- *Migra v. Warren City School District Board of Education*, 465 U.S. 75, 81 (1984)
- *Kay v. City of Rancho Palos Verdes*, 504 F.3d 803, 808 (9th Cir. 2007)
- *Mycogen Corp. v. Monsanto Co.*, 28 Cal. 4th 888, 896-97 (2002)
- *Citizens for Open Access to Sand & Tide, Inc. v. Seadrift Association*, 60 Cal. App. 4th 1053, 1064-65 (1998)
- *Palomar Mobilehome Park Association v. City of San Marcos*, 989 F.2d 362, 364 (9th Cir. 1993)

- Adam Bros. Farming v. County of Santa Barbara, 604 F.3d 1142, 1148-49 (9th Cir. 2010)
- Furnace v. Giurbino, 838 F.3d 1019, 1024 (9th Cir. 2016)
- Crowley v. Katleman, 8 Cal. 4th 666, 682 (1994)
- Frank v. Ocwen Loan Servicing, LLC, 2017 WL 8116460, at \*4 (C.D. Cal. Mar. 30, 2017)
- Janson v. Deutsche Bank National Trust Co., 2015 WL 1250092, at \*9 (Mar. 18, 2015)
- DKN Holdings LLC v. Faerber, 61 Cal. 4th 813, 825 (2015)
- People v. Scott, 85 Cal. App. 4th 905, 919 (2000)
- Sommer v. City of Redondo Beach, 2019 WL 2970835, at \*5 (C.D. Cal. Mar. 12, 2019)
- Hawkins v. Bewley Allen Cadillac, 959 F.2d 240 (9th Cir. 1992) (unpublished)
- Sanderson v. Niemann, 17 Cal. 2d 563, 573 (1941)
- Parada v. Claims Court, 70 Cal. App. 3d 766, 769 (1977)
- Cook v. Superior Court, 274 Cal. App. 2d 675, 677-78 (1969)
- Pitzen v. Superior Court, 120 Cal. App. 4th 1374, 1380 (2004)
- Sandoval v. Superior Court, 140 Cal. App. 3d 932, 936-37 (1983)
- Cruz v. Select Portfolio Servicing, Inc., 2019 WL 2299857, at \*5 (N.D. Cal. May 30, 2019)
- Turner v. Duncan, 158 F.3d 449, 455 (9th Cir. 1998)
- Martinez v. Ylst, 951 F.2d 1153, 1156-57 (9th Cir. 1991)