

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA, SACRAMENTO DIVISION

Mr. Roof and Solar, Inc. dba American Eagle Roofing v. Sequoia
Roofing and Construction, Tyler Anderson, and Robert Williams

Mr. Roof and Solar · No. 2:25-cv-00510-AC · Decided April 21, 2025

SUMMARY

The United States District Court for the Eastern District of California dismissed Robert Williams’s counterclaims for breach of contract, unpaid wages, and waiting-time penalties. The court held that the counterclaims did not fall within its original jurisdiction and were not sufficiently related to the plaintiff’s copyright-infringement claim to support supplemental jurisdiction under 28 U.S.C. § 1367. The court also stated that it would decline supplemental jurisdiction even if it existed.

CASE DETAILS

COURT	United States District Court for the Eastern District of California, Sacramento Division
WRITING FOR THE COURT	Allison Claire
JURISDICTION	United States District Court for the Eastern District of California, Sacramento Division
DECIDED	April 21, 2025
DOCKET	2:25-cv-00510-AC
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff moved under Federal Rule of Civil Procedure 12(b)(1) to dismiss Robert Williams's counterclaims for lack of subject matter jurisdiction.
STANDARD OF REVIEW	On a facial Rule 12(b)(1) challenge, the court considers the allegations in the pleading, accepts well-pleaded factual allegations as true, and applies the plausibility standard to determine whether the pleading sufficiently invokes federal jurisdiction.
PRECEDENTIAL VALUE	Unknown

TOPICS

subject matter jurisdiction

motions to dismiss

civil procedure

copyright infringement

employment contracts

PRACTICE AREAS

civil procedure

copyright

employment law

commercial litigation

QUESTIONS PRESENTED

1. Whether the district court had original federal subject matter jurisdiction over Williams's state-law counterclaims for breach of contract, unpaid wages, and waiting-time penalties.
2. Whether the counterclaims fell within the court's supplemental jurisdiction under 28 U.S.C. § 1367(a) because they formed part of the same case or controversy as the copyright-infringement claim.
3. Whether the court should decline supplemental jurisdiction under 28 U.S.C. § 1367(c) even if supplemental jurisdiction existed.

HOLDINGS

1. The court lacked original subject matter jurisdiction over Williams's state-law counterclaims for breach of contract, unpaid wages, and waiting-time penalties.
2. The court lacked supplemental jurisdiction over Williams's counterclaims because the pleadings did not establish that the counterclaims and the copyright-infringement claim formed part of the same case or controversy.
3. Even if supplemental jurisdiction existed, the court would decline to exercise it under 28 U.S.C. § 1367(c).

KEY QUOTATIONS

“The pleadings do not establish that Defendant’s counterclaims form a part of the same case or controversy as Plaintiff’s claim for Copyright Infringement under 17 U.S.C. § 101 et seq., as Defendant Robert Williams has failed to establish that his counterclaims and Plaintiff’s claim are derived from a common nucleus of operative fact.” (at 2)

FACTUAL BACKGROUND

Mr. Roof and Solar, doing business as American Eagle Roofing, alleged that former employees Tyler Anderson and Robert Williams joined competitor Sequoia Roofing and Construction, which then used construction contracts allegedly copied from American Eagle's contracts. American Eagle asserted a single federal copyright-infringement claim. Williams separately asserted counterclaims concerning allegedly unpaid compensation and commissions under his employment agreement, including wage claims and waiting-time penalties; those counterclaims did not rely on the facts concerning the allegedly copied construction contracts or the defendants' work for Sequoia.

PROCEDURAL HISTORY

Mr. Roof and Solar, Inc. brought a copyright-infringement action against Sequoia Roofing and Construction, Tyler Anderson, and Robert Williams. Williams filed counterclaims against Mr. Roof for breach of an employment contract, unpaid wages, and California waiting-time penalties. The district court granted Mr. Roof's motion to dismiss the counterclaims for lack of original and supplemental subject matter jurisdiction.

DISPOSITION

dismissed

CASES CITED

- Safe Air for Everyone v. Meyer, 373 F.3d 1035, 1039 (9th Cir.)
- White v. Lee, 227 F.3d 1214, 1242 (9th Cir.)
- Howard Jarvis Taxpayers Ass'n v. California Secure Choice Retirement Savings Program, 443 F. Supp. 3d 1152, 1156 (E.D. Cal.)
- Diva Limousine, Ltd. v. Uber Techs., Inc., 392 F. Supp. 3d 1074, 1084 (N.D. Cal.)
- Terenkian v. Republic of Iraq, 694 F.3d 1122, 1131 (9th Cir.)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- United States v. Morton, 467 U.S. 822, 828 (1984)
- Cooper v. Tokyo Elec. Power Co., 990 F. Supp. 2d 1035, 1038 (S.D. Cal.)
- Kokkonen v. Guardian Life Ins. Co., 511 U.S. 375, 377 (1994)
- In re Wilshire Courtyard, 729 F.3d 1279, 1284 (9th Cir.)