

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF  
TENNESSEE

Pratt v. Portfolio Recovery Associates, PRA Group, Inc., and Vikram  
Atal

Pratt · No. 2:24-cv-02499-SHL-atc · Decided February 5, 2026

SUMMARY

The United States District Court for the Western District of Tennessee adopted a magistrate judge’s Report and Recommendation and granted Vikram Atal’s and PRA Group, Inc.’s motions to dismiss for lack of personal jurisdiction. The court dismissed the amended complaint without prejudice as to those defendants, while the action proceeded against Portfolio Recovery Associates, LLC.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                        |
|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Western District of Tennessee                                                                                                                                                                                                                                     |
| WRITING FOR THE COURT | Sheryl H. Lipman                                                                                                                                                                                                                                                                                       |
| JURISDICTION          | United States District Court for the Western District of Tennessee                                                                                                                                                                                                                                     |
| DECIDED               | February 5, 2026                                                                                                                                                                                                                                                                                       |
| DOCKET                | 2:24-cv-02499-SHL-atc                                                                                                                                                                                                                                                                                  |
| DISPOSITION           | dismissed                                                                                                                                                                                                                                                                                              |
| PROCEDURAL POSTURE    | The district court reviewed a magistrate judge's Report and Recommendation recommending dismissal of the amended complaint against Vikram Atal and PRA Group, Inc. for lack of personal jurisdiction. No objections were filed, so the district court reviewed the R&R for clear error and adopted it. |
| STANDARD OF REVIEW    | A district court reviews de novo proposed findings or conclusions to which a party specifically objects and reviews the remainder for clear error. Because Pratt filed no objections, the court reviewed the R&R in its entirety for clear error.                                                      |
| PRECEDENTIAL VALUE    | unpublished district court order                                                                                                                                                                                                                                                                       |
| PARTIES               | Kevin Pratt v. Portfolio Recovery Associates, PRA Group, Inc., Vikram Atal                                                                                                                                                                                                                             |

TOPICS

personal jurisdiction

motions to dismiss

fair debt collection

credit reporting

truth in lending

## PRACTICE AREAS

civil procedure

consumer protection

fair debt collection

credit reporting

truth in lending

## QUESTIONS PRESENTED

1. Whether the district court had specific personal jurisdiction over Vikram Atal.
2. Whether the district court had specific personal jurisdiction over PRA Group, Inc.
3. Whether the magistrate judge's recommendation to dismiss the amended complaint against Atal and PRA Group, Inc. for lack of personal jurisdiction should be adopted.

## HOLDINGS

1. The court lacked specific personal jurisdiction over Atal and PRA Group, Inc. because Pratt did not establish purposeful availment of Tennessee, a sufficient nexus between his claims and the defendants' Tennessee activities, or that exercising jurisdiction would be reasonable.
2. Because Pratt filed no objections, the district court reviewed the R&R for clear error, found none, and adopted it.

## KEY QUOTATIONS

*“litigating this case in Tennessee is clearly burdensome on them, Tennessee has little interest in the results of a case concerning debt collection efforts that took place in Mississippi, and Pratt's interest in obtaining relief is adequately protected through his claims against PRA LLC.”* (PageID 444-45)

## FACTUAL BACKGROUND

Pratt alleged that Defendants improperly acquired and attempted to collect Capital One accounts and that the collection efforts violated federal consumer-protection laws. He alleged that the relevant occurrences took place in Memphis, Tennessee and that Atal and PRA Group, Inc. were indirectly responsible for PRA LLC's conduct because Atal was PRA Group's CEO and PRA Group wholly owned PRA LLC. Atal stated that he was a Virginia resident without relevant Tennessee contacts, while PRA Group asserted that it was incorporated in Delaware, headquartered in Virginia, operated separately from PRA LLC, and did not directly purchase, own, or collect defaulted accounts or conduct business in Tennessee.

## PROCEDURAL HISTORY

Pratt filed claims under the Fair Debt Collection Practices Act, Fair Credit Reporting Act, the Constitution, and later the Truth in Lending Act based on alleged collection activity concerning Capital One accounts. After the initial motions to dismiss became moot following amendment, Atal and PRA Group, Inc. moved to dismiss for lack of personal jurisdiction. Magistrate Judge Annie T. Christoff recommended granting the motions while allowing the action to proceed against PRA LLC. The district court found no clear error, adopted the R&R, and dismissed the amended complaint without prejudice as to Atal and PRA Group, Inc.

## DISPOSITION

dismissed

## CASES CITED

- Carbone v. Kaal, 140 F.4th 805, 810 (6th Cir. 2025)
- Bulso v. O'Shea, 730 F. App'x 347, 349 (6th Cir. 2018)

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