

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

Petrini v. Naran

No. 5:25-cv-02896-EJD (N.D. Cal. Oct. 8, 2025) · No. 5:25-cv-02896-EJD · Decided October 8, 2025

SUMMARY

The United States District Court for the Northern District of California adopted a magistrate judge’s report and recommendation dismissing Plaintiffs’ amended complaint. Claims one through three were dismissed without leave to amend for failure to state a claim because the underlying state-court proceeding was civil rather than criminal. Claim four was dismissed for lack of subject matter jurisdiction under the Rooker-Feldman doctrine after Plaintiffs failed to file a further amended complaint.

CASE DETAILS

COURT	United States District Court for the Northern District of California
JURISDICTION	United States District Court for the Northern District of California
DECIDED	October 8, 2025
DOCKET	5:25-cv-02896-EJD
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court reviewed and adopted a magistrate judge's report and recommendation recommending dismissal of the amended complaint for failure to state a claim and lack of subject matter jurisdiction.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Katrina Popovich Petrini, et al. v. Sarju Naran, et al.

TOPICS

- subject matter jurisdiction
- pleadings
- civil procedure
- default judgment

PRACTICE AREAS

- civil procedure
- federal jurisdiction
- civil rights

QUESTIONS PRESENTED

1. Whether the first three claims of the first amended complaint stated a claim for relief when they were based on the mistaken premise that Defendants had initiated a criminal prosecution rather than a civil action under California Penal Code § 502.
2. Whether the Rooker-Feldman doctrine deprived the federal district court of subject matter jurisdiction over the fourth claim because the claim constituted a de facto appeal from a state-court judgment.
3. Whether Plaintiffs' objections required rejection of the magistrate judge's recommendation or further leave to amend.

HOLDINGS

1. The first three claims failed to state a claim because they were based on the mistaken premise that Defendants' state-court cross-complaint was a criminal proceeding; the cross-complaint instead asserted a civil claim authorized by California Penal Code § 502(e)(1).
2. The Rooker-Feldman doctrine deprived the federal district court of subject matter jurisdiction over the fourth claim because Plaintiffs' complaint was a de facto appeal asserting as a legal wrong an allegedly erroneous state-court decision.
3. Plaintiffs were not granted further leave to amend the first three claims, and the fourth claim was dismissed after Plaintiffs failed to file a second amended complaint by the court-ordered deadline.

KEY QUOTATIONS

“the Rooker-Feldman doctrine ‘prohibits a federal district court from exercising subject matter jurisdiction over a suit that is a de facto appeal from a state court judgment.’” (at 4)

“Plaintiffs’ complaint is a de facto appeal because they are asserting ‘as a legal wrong an allegedly erroneous decision by a state court.’” (at 5)

FACTUAL BACKGROUND

The federal action arose from an earlier California state-court proceeding in which Defendants filed a cross-complaint alleging a violation of California Penal Code § 502. Plaintiffs alleged that the state-court proceeding resulted in a default judgment exceeding \$171,000 that was enforced against their property in Texas. Their federal claims treated the state-court proceeding as criminal and sought relief based on alleged errors in the state-court judgment.

PROCEDURAL HISTORY

Plaintiffs filed an original complaint concerning an earlier state-court action and a judgment allegedly enforced against property in Texas. On screening under 28 U.S.C. § 1915(e), the magistrate judge found the original complaint deficient; after Plaintiffs filed a first amended complaint, a second screening order found the first three claims failed to state a claim and the fourth claim was barred by lack of subject matter jurisdiction, granting leave to amend only as to the fourth claim. Plaintiffs did not timely file a second amended complaint, and the district court adopted the magistrate judge's recommendation, overruled Plaintiffs' objections, and dismissed the action.

DISPOSITION

dismissed

CASES CITED

- Kougasian v. TMSL, Inc., 359 F.3d 1136, 1139-1140 (9th Cir. 2004)
- Noel v. Hall, 341 F.3d 1148, 1154 (9th Cir. 2003)

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