

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH
CAROLINA

Jane Doe v. Three Rivers Behavioral Health, LLC; Universal Health
Services, Inc.; and UHS of Delaware, Inc.

Doe · No. 3:25-12813-JFA · Decided January 6, 2026

SUMMARY

The United States District Court for the District of South Carolina denied Jane Doe’s motion to remand and alternative request for jurisdictional discovery. The court held that the defendants established complete diversity and that the amount-in-controversy requirement was satisfied, supporting federal jurisdiction over Doe’s state-law claims arising from alleged abuse at a behavioral health facility.

CASE DETAILS

COURT	United States District Court for the District of South Carolina
WRITING FOR THE COURT	Joseph F. Anderson, Jr.
JURISDICTION	United States District Court for the District of South Carolina
DECIDED	January 6, 2026
DOCKET	3:25-12813-JFA
DISPOSITION	remanded
PROCEDURAL POSTURE	Plaintiff moved to remand a removed state-law personal-injury action and alternatively requested jurisdictional discovery concerning the citizenship and principal place of business of the defendants.
STANDARD OF REVIEW	The removing party bears the burden of establishing federal jurisdiction, and removal jurisdiction is strictly construed; if federal jurisdiction is doubtful, remand is required. The amount in controversy is evaluated by a preponderance of the evidence when contested.
PRECEDENTIAL VALUE	Unknown
PARTIES	Jane Doe v. Three Rivers Behavioral Health, LLC, Universal Health Services, Inc., UHS of Delaware, Inc.

TOPICS

subject matter jurisdiction

civil procedure

personal injury

negligence

health law

PRACTICE AREAS

civil procedure

diversity jurisdiction

removal and remand

personal injury

health law

QUESTIONS PRESENTED

1. Whether Three Rivers Behavioral Health, LLC's citizenship should be determined under the nerve-center test applicable to corporations rather than by tracing the citizenship of its members.
2. Whether UHS's principal place of business was in South Carolina because it allegedly delegated managerial functions to Three Rivers.
3. Whether Plaintiff was entitled to jurisdictional discovery concerning UHS's principal place of business.
4. Whether the amount-in-controversy requirement for diversity jurisdiction was satisfied.
5. Whether remand was required under 28 U.S.C. § 1447(c).

HOLDINGS

1. An LLC is not assigned citizenship under the nerve-center test applicable to corporations; its citizenship is determined by tracing the citizenship of its members through the ownership structure. Three Rivers was therefore a citizen of Delaware and Pennsylvania.
2. UHS is a citizen of Delaware and Pennsylvania because the evidence established that Pennsylvania was the location of its corporate direction, control, and coordination.
3. Jurisdictional discovery was unwarranted because Plaintiff did not show that UHS's principal place of business was unclear or genuinely disputed in light of the defendants' competent evidence.
4. The amount-in-controversy requirement was satisfied because the alleged severe physical and emotional injuries, extended period of abuse, and claims for compensatory and punitive damages supported an amount exceeding \$75,000 by a preponderance of the evidence. Because subject matter jurisdiction existed, remand was denied.

KEY QUOTATIONS

“The party seeking removal bears “the burden of establishing federal jurisdiction.”” (II)

“Removal jurisdiction is to be strictly construed in light of federalism concerns.” (II)

“The “nerve center” test applies to corporations, not unincorporated associations such as Three Rivers.” (III.a)

“Defendants have established that this Court has subject matter jurisdiction under 28 U.S.C. § 1332(a).” (IV)

FACTUAL BACKGROUND

Plaintiff asserted state-law claims for gross negligence, negligence, negligent supervision, negligent infliction of emotional distress, and premises liability based on alleged sexual, physical, and emotional abuse suffered while

she was a minor resident at Three Rivers Behavioral Health. Defendant Three Rivers was an LLC whose citizenship was traced through layered LLCs to Premier Behavioral Solutions, Inc., a Delaware corporation with its principal place of business in Pennsylvania. The defendants submitted corporate filings and a declaration identifying Pennsylvania as UHS's location of corporate direction, control, and coordination, while Plaintiff relied primarily on information from Three Rivers's website to argue that UHS's principal place of business was in South Carolina.

PROCEDURAL HISTORY

Plaintiff filed state-law claims in the Court of Common Pleas for the Eleventh Judicial Circuit, Lexington County, South Carolina. Defendant UHS removed the action to the United States District Court for the District of South Carolina under diversity jurisdiction. The district court denied the motion to remand and the alternative request for jurisdictional discovery, finding that complete diversity and the amount-in-controversy requirement were established.

DISPOSITION

remanded

REMAND INSTRUCTIONS

No remand to state court was ordered. The motion to remand and alternative request for jurisdictional discovery were denied. The stay on the deadline to respond to the pending motion to dismiss was lifted upon filing of the order.

CASES CITED

- Mulcahey v. Columbia Organic Chems. Co., 29 F.3d 148, 151 (4th Cir. 1994)
- Ellenburg v. Spartan Motors Chassis, Inc., 519 F.3d 192, 199-200
- Lontz v. Tharp, 413 F.3d 435, 440-441 (4th Cir. 2005)
- Chalpin Realty SC LLC v. Jersam Realty Inc., No. 24-1971, 2025 WL 3654605, at *2 (4th Cir. Dec. 17, 2025)
- Capps v. Newmark S. Region, LLC, 53 F.4th 299, 302 (4th Cir. 2022)
- Hertz Corp. v. Friend, 559 U.S. 77, 92-93 (2010)
- Dart Cherokee Basin Operating Co., LLC v. Owens, 574 U.S. 81, 82 (2014)

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