

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
PENNSYLVANIA

Samiyha West v. Capital One Auto Finance et al.

West · No. 25-5661 · Decided December 16, 2025

SUMMARY

The United States District Court for the Eastern District of Pennsylvania granted Capital One Auto Finance's motion to stay an action concerning the alleged unlawful repossession of the plaintiff's vehicle. The court held that because the plaintiff filed Chapter 7 bankruptcy after the claims accrued, those claims became property of the bankruptcy estate and could be pursued only by the bankruptcy trustee or an authorized representative. The court rejected the plaintiff's unsupported assertion that she had converted her bankruptcy case to Chapter 13 and granted related motions to extend deadlines and file a sur-reply.

CASE DETAILS

COURT	United States District Court for the Eastern District of Pennsylvania
WRITING FOR THE COURT	Kai N. Scott
JURISDICTION	United States District Court for the Eastern District of Pennsylvania
DECIDED	December 16, 2025
DOCKET	25-5661
DISPOSITION	other
PROCEDURAL POSTURE	Defendant Capital One Auto Finance moved to stay the civil action after Plaintiff filed a Chapter 7 bankruptcy petition and listed the action as an asset of the bankruptcy estate. The court granted the motion to stay pending possible intervention by the Chapter 7 trustee.
PRECEDENTIAL VALUE	Unknown

TOPICS

- standing
- bankruptcy
- civil procedure

PRACTICE AREAS

- bankruptcy
- civil procedure
- consumer protection

QUESTIONS PRESENTED

1. Whether claims that accrued before a debtor filed for Chapter 7 bankruptcy became property of the bankruptcy estate and could thereafter be pursued only by the bankruptcy trustee or a duly appointed representative.
2. Whether the civil action should be stayed pending possible intervention by the Chapter 7 trustee.
3. Whether Plaintiff's asserted conversion from Chapter 7 to Chapter 13 eliminated the basis for the requested stay.

HOLDINGS

1. Causes of action that accrued before the filing of a bankruptcy petition become property of the bankruptcy estate and may thereafter be prosecuted only by the bankruptcy trustee or a duly appointed representative; while the bankruptcy case is pending, the debtor lacks capacity to pursue those claims.
2. A stay of the action was warranted pending potential intervention by the Chapter 7 trustee because West was no longer the real party in interest and lacked capacity to pursue the estate claims.
3. Plaintiff's asserted conversion did not affect the motion because the record contained no evidence that she had moved to convert or that the bankruptcy case was proceeding under Chapter 13.

KEY QUOTATIONS

"The statutory and caselaw is clear that any causes of action [that] accrue to a debtor who has filed for relief under the Bankruptcy Act before the filing of the bankruptcy petition become the property of the bankruptcy estate and may thereafter be prosecuted only by the trustee or a duly appointed representative of the estate."
(Analysis)

"While a bankruptcy case is pending, it is the trustee, and not the debtor, who has the capacity to pursue the debtor's claims." (Analysis)

FACTUAL BACKGROUND

Samiyha West asserted seven claims concerning the alleged unlawful repossession of her vehicle around April 2025. She filed a Chapter 7 bankruptcy petition on October 24, 2025, after the causes of action had accrued, and listed this action as an asset of her bankruptcy estate. Capital One notified the court of the bankruptcy and sought a stay pending possible intervention by the bankruptcy trustee.

PROCEDURAL HISTORY

Plaintiff filed the action on September 30, 2025, and an amended complaint on October 30, 2025, asserting seven claims arising from the alleged repossession of her vehicle. Plaintiff filed for Chapter 7 bankruptcy on October 24, 2025, and listed this action as an estate asset. Capital One moved to stay the action, Plaintiff opposed the motion and sought leave to file a sur-reply, and the court granted the sur-reply and deadline-extension motions before granting the stay.

DISPOSITION

other

REMAND INSTRUCTIONS

The proceedings are stayed pending potential intervention by the Chapter 7 trustee appointed in Plaintiff's bankruptcy proceedings.

CASES CITED

- Chrysler Credit Corp. v. B.J.M., Jr., Inc., 1992 WL 333586, at *2 (E.D. Pa. Nov. 9, 1992)
- Committee of Unsecured Creditors of Specialty Plastic v. Doemling, 127 Bankr. 945, 948 (W.D. Pa. 1991)
- Lambert v. Fuller Company, Inc., 122 Bankr. 243, 245 (E.D. Pa. 1990)
- Bartel v. Foster Wheel Co., 2015 WL 6750379, at *4 (E.D. Pa. Nov. 4, 2015)
- In re Kane, 628 F.3d 631, 637 (3d Cir. 2010)