

SUPREME COURT OF THE UNITED STATES

Jackson v. Ashton

33 U.S. 148 (1834) · Decided March 18, 1834

SUMMARY

The Supreme Court held that the title or caption of a bill is not part of the bill and does not cure defects in pleading jurisdictional facts. Because the pleadings did not adequately state the parties' citizenship, the circuit court lacked jurisdiction, requiring reversal of its decree and dismissal of the appeal.

CASE DETAILS

COURT	Supreme Court of the United States
WRITING FOR THE COURT	Chief Justice Marshall
JURISDICTION	Federal
DECIDED	March 18, 1834
DISPOSITION	reversed
PROCEDURAL POSTURE	Appeal from a decree of the United States Circuit Court for the Eastern District of Pennsylvania. The Supreme Court reviewed whether the circuit court had jurisdiction despite defects in the bill's pleading of the parties' citizenship.
PRECEDENTIAL VALUE	Published Supreme Court opinion
PARTIES	Thomas Jackson et al. v. William E. Ashton

TOPICS

- subject matter jurisdiction
- pleadings
- appellate jurisdiction
- appellate procedure
- civil procedure

PRACTICE AREAS

- Civil procedure
- Federal jurisdiction
- Appellate procedure

QUESTIONS PRESENTED

- Whether the caption or title of a bill can cure defects in the bill's allegations concerning the parties' citizenship.

2. Whether the bill adequately pleaded facts establishing federal jurisdiction based on the parties' citizenship.
3. Whether the circuit court had jurisdiction to entertain the cause.

HOLDINGS

1. The title or caption of a bill is not part of the bill and does not cure defects in its pleading.
2. A bill and the proceedings must state the citizenship of the parties to establish jurisdiction; the statement that the defendant was "of Philadelphia" was insufficient.

KEY QUOTATIONS

"The title or caption of the bill, is no part of the bill, and does not remove the objection to the defects in the pleadings." (149)

"The bill and proceedings should state the citizenship of the parties, to give the court jurisdiction of the case." (149)

FACTUAL BACKGROUND

The bill's caption identified the parties, but the body of the bill did not state their citizenship. The bill stated only that the defendant was "of Philadelphia," and the circuit court nevertheless entertained jurisdiction.

PROCEDURAL HISTORY

The circuit court entertained the cause and entered a decree. The Supreme Court held that the bill did not adequately allege the parties' citizenship, reversed the circuit court's decree, and dismissed the appeal.

DISPOSITION

reversed

REMAND INSTRUCTIONS

The reversal and dismissal were to be certified to the circuit court under the seal of the Supreme Court.