

OHIO COURT OF APPEALS, TENTH APPELLATE DISTRICT

Wilkes v. Williams

2026-Ohio-1727 · No. 25AP-743 · Decided May 12, 2026

SUMMARY

The Tenth District Court of Appeals affirmed the Franklin County Municipal Court’s sua sponte dismissal of Katrina Wilkes’s complaint for lack of subject-matter jurisdiction. The court held that Wilkes’s separate \$15,000 claims against two defendants were properly construed in the conjunctive, resulting in a \$30,000 demand exceeding the municipal court’s \$15,000 jurisdictional limit under R.C. 1901.17. The court also noted that Wilkes’s appellate brief failed to comply with App.R. 16(A)(3) and (7), but reviewed the jurisdictional issue in the interest of justice.

CASE DETAILS

COURT	Ohio Court of Appeals, Tenth Appellate District
WRITING FOR THE COURT	Edelstein, J.; Beatty Blunt, J.; Mentel, J.
JURISDICTION	Ohio Court of Appeals, Tenth Appellate District
DECIDED	May 12, 2026
DOCKET	25AP-743
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from the Franklin County Municipal Court's sua sponte dismissal of a tenant's complaint for lack of subject-matter jurisdiction.
STANDARD OF REVIEW	Subject-matter jurisdiction and dismissal under Civ.R. 12(B)(1) are reviewed de novo. The standard for Civ.R. 12(B)(1) dismissal is whether the complaint raises any cause of action cognizable by the forum.
PRECEDENTIAL VALUE	Published
PARTIES	Katrina Wilkes v. Charah Williams, Tamara Perry

TOPICS

- subject matter jurisdiction
- appellate procedure
- standard of review
- civil procedure
- default judgment

PRACTICE AREAS

- civil procedure
- appellate procedure
- landlord-tenant law
- municipal law

QUESTIONS PRESENTED

1. Whether the Franklin County Municipal Court had subject-matter jurisdiction over a complaint seeking \$15,000 from each of two defendants.
2. Whether the municipal court properly dismissed the complaint sua sponte under Civ.R. 12(B)(1) and Civ.R. 12(H)(3).
3. Whether the appellant's procedurally deficient assignment of error and brief provided grounds for reversal.

HOLDINGS

1. A municipal court lacks subject-matter jurisdiction when the amount claimed by any party, as pleaded in the complaint, exceeds the \$15,000 limit established by R.C. 1901.17. Because Wilkes sought \$15,000 from each of two defendants in separate, nonalternative demands, the total amount claimed was \$30,000 and exceeded the jurisdictional limit.
2. A court may raise subject-matter jurisdiction sua sponte and must dismiss the action when it appears that the court lacks subject-matter jurisdiction.
3. The court may disregard or summarily overrule an assignment of error that fails to identify the challenged ruling or present a supported argument, but it may review the judgment in the interest of justice when the arguments permit review. Here, despite the briefing deficiencies, the court reviewed the jurisdictional issue and found no reversible error.

KEY QUOTATIONS

“Under R.C. 1901.17, municipal courts have jurisdiction “only in those cases in which the amount claimed by any party . . . does not exceed fifteen thousand dollars.”” (¶ 14)

“Accordingly, the trial court lacked subject-matter jurisdiction over this action and, thus, even assuming proper service on appellees, the court was unable to rule on Ms. Wilkes’s motion for default judgment or otherwise determine any of the claims raised in Ms. Wilkes’s complaint.” (¶ 17)

FACTUAL BACKGROUND

Wilkes sued Charah Williams and Tamara Perry for alleged retaliation prohibited by R.C. 5321.02. Her complaint separately demanded \$15,000 from Williams and \$15,000 from Perry, for a total demand of \$30,000. The municipal court construed the demands in the conjunctive and dismissed the action because the amount exceeded the court's statutory jurisdictional limit.

PROCEDURAL HISTORY

Wilkes filed a complaint alleging retaliatory conduct under Ohio's Landlord-Tenant Law and sought \$15,000 from each of two defendants. The Franklin County Municipal Court dismissed the complaint sua sponte because the combined demand exceeded the municipal court's \$15,000 monetary jurisdictional limit. The Tenth District reviewed the dismissal and affirmed.

DISPOSITION

affirmed

CASES CITED

- Lee v. Ohio Dept. of Job & Family Servs., 2006-Ohio-6658, ¶ 9 (10th Dist.)
- In re Guardianship of Williams, 2022-Ohio-617, ¶ 26 (8th Dist.)
- Angus v. Angus, 2015-Ohio-2538, ¶ 10 (10th Dist.)
- CitiMortgage, Inc. v. Asamoah, 2012-Ohio-4422, ¶ 5
- State v. Dunlap, 2005-Ohio-6754, ¶ 10
- Williams v. Barrick, 2008-Ohio-4592, ¶ 24 (1st Dist.)
- Miller v. Johnson & Angelo, 2002-Ohio-3681, ¶ 2 (10th Dist.)
- State ex rel. Bush, 42 Ohio St.3d 77, 80 (1989)
- Nacelle Land & Mgt. Corp. v. Ohio Dept. of Natural Resources, 65 Ohio App.3d 481, 483 (10th Dist.)
- Cotten v. Ohio Dept. of Rehab. & Corr., 2018-Ohio-3392, ¶ 6 (10th Dist.)
- State v. Harper, State v. Harper, 2020-Ohio-2913, ¶ 23
- Bank of Am., N.A. v. Kuchta, 2014-Ohio-4275, ¶ 19
- Morrison v. Steiner, 32 Ohio St.2d 86, 87 (1972)
- Corder v. Ohio Edison Co., 2020-Ohio-5220, ¶ 14
- Pratts v. Hurley, 2004-Ohio-1980, ¶¶ 11-12
- State ex rel. Tubbs Jones v. Suster, 84 Ohio St.3d 70, 75 (1998)
- Hulbert v. Buehrer, 2017-Ohio-844, ¶ 12 (10th Dist.)
- Klosterman v. Turnkey-Ohio, L.L.C., 2009-Ohio-2508, ¶ 19 (10th Dist.)
- Pointer v. Smith, 2021-Ohio-2247, ¶ 8 (10th Dist.)
- Pankey v. Ohio Dept. of Rehab. & Corr., 2014-Ohio-2907, ¶ 7 (10th Dist.)
- Dunlop v. Ohio Dept. of Job & Family Servs., 2012-Ohio-1378, ¶ 4 (10th Dist.)
- Temethy v. Ohio Dept. of Job & Family Servs., 2026-Ohio-930, ¶ 9 (8th Dist.)
- Cardi v. State, 2012-Ohio-6157, ¶ 8 (10th Dist.)
- Adams v. Cox, 2010-Ohio-415, ¶ 19 (10th Dist.)
- Behrle v. Beam, 6 Ohio St.3d 41, 43-44 (1983)
- State ex rel. Natl. Emp. Benefit Servs. v. Court of Common Pleas, 49 Ohio St.3d 49, 50 (1990)
- Williams Creek Homeowners Assn. v. Zweifel, 2008-Ohio-2434, ¶ 102 (10th Dist.)
- Wells v. Murrell, 2020-Ohio-5277, ¶ 10 (2d Dist.)
- Lance Langan Water Jetting, Inc. v. Tiger Gen., Inc., 2005-Ohio-4541, ¶ 9 (9th Dist.)
- Stewart v. Dina's Pizza and Pub, Inc., 2018-Ohio-3415, ¶ 10 (8th Dist.)
- Turowski v. Apple Vacations, Inc., 2004-Ohio-33, ¶ 8 (9th Dist.)

