

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO

Tekisha Rousseaux Castellanos v. Sandia Frame & Unibody Alignment, Inc.

Castellanos · No. 1:26-cv-00500-KG-JMR · Decided March 23, 2026

SUMMARY

The United States District Court for the District of New Mexico dismissed Plaintiff Tekisha Rousseaux Castellanos’s claims against Sandia Frame & Unibody Alignment, Inc. without prejudice for lack of subject-matter jurisdiction. The court concluded that Plaintiff had not established federal-question, diversity, or supplemental jurisdiction and had not filed an amended complaint curing the jurisdictional defects.

CASE DETAILS

COURT	United States District Court for the District of New Mexico
WRITING FOR THE COURT	Kenneth J. Gonzales
JURISDICTION	United States District Court for the District of New Mexico
DECIDED	March 23, 2026
DOCKET	1:26-cv-00500-KG-JMR
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court reviewed the complaint and plaintiff's response to an order to show cause regarding subject-matter jurisdiction.
STANDARD OF REVIEW	The court independently assessed whether subject-matter jurisdiction existed and applied the mandatory dismissal requirement of Federal Rule of Civil Procedure 12(h)(3).
PRECEDENTIAL VALUE	unpublished district court memorandum opinion and order
PARTIES	Tekisha Rousseaux Castellanos v. Sandia Frame & Unibody Alignment, Inc.

TOPICS

- subject matter jurisdiction
- civil procedure
- pleadings
- consumer protection

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the complaint established federal-question jurisdiction under 28 U.S.C. § 1331.
2. Whether the complaint established diversity jurisdiction under 28 U.S.C. § 1332.
3. Whether supplemental jurisdiction under 28 U.S.C. § 1367 could exist based on a separate related federal action.
4. Whether the action had to be dismissed without prejudice for lack of subject-matter jurisdiction.

HOLDINGS

1. Supplemental jurisdiction under 28 U.S.C. § 1367 is available only in a civil action in which the federal court has original jurisdiction; a separate subsequent action cannot obtain supplemental jurisdiction merely because it shares a nucleus of operative facts with another federal action.
2. The complaint did not establish federal-question jurisdiction because it identified no federal statutory or constitutional provision as the basis of plaintiff's claims and alleged no facts showing that the claims arose under federal law.
3. The complaint did not establish diversity jurisdiction because it failed to allege facts showing that plaintiff and defendant were citizens of different states, even though plaintiff asserted that damages exceeded \$75,000.
4. The action had to be dismissed without prejudice because the court lacked subject-matter jurisdiction.

KEY QUOTATIONS

“In a subsequent lawsuit involving claims with no independent basis for jurisdiction, a federal court lacks the threshold jurisdictional power that exists when ancillary claims are asserted in the same proceeding as the claims conferring federal jurisdiction.”

“The Court dismisses this case without prejudice for lack of subject-matter jurisdiction.”

FACTUAL BACKGROUND

Plaintiff delivered her vehicle to defendant for collision, suspension, and alignment repairs. She alleged that defendant improperly performed the suspension and alignment work and asserted negligence, breach of implied warranty of merchantability, and consumer fraud or unfair trade practices. The complaint identified plaintiff as a New Mexico resident and defendant as a New Mexico corporation with its principal place of business in New Mexico, and it did not identify a federal cause of action.

PROCEDURAL HISTORY

Plaintiff filed claims for negligence, breach of implied warranty of merchantability, and consumer fraud or unfair trade practices concerning vehicle repairs. A magistrate judge ordered plaintiff to show cause why the case should not be dismissed for lack of subject-matter jurisdiction and directed her to file an amended complaint. Plaintiff filed a response asserting federal-question, diversity, and supplemental jurisdiction, but did not file an

amended complaint. The district court dismissed the action without prejudice for lack of subject-matter jurisdiction.

DISPOSITION

dismissed

CASES CITED

- Peacock v. Thomas, 516 U.S. 349, 357 (1996)
- Ortolf v. Silver Bar Mines, Inc., 111 F.3d 85, 87 (9th Cir. 1997)
- Davison v. Grant Thornton LLP, 582 F. App'x 773, 775 (10th Cir. 2014)
- Martinez v. U.S. Olympic Committee, 802 F.2d 1275, 1280 (10th Cir. 1986)
- Mourning v. Family Publications Service, Inc., 411 U.S. 356 (1973)

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