

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Saran Adams v. Velocity Commercial Capital, LLC

Adams v. Velocity · No. 2:25-cv-04291-SRM-RAO · Decided October 30, 2025

SUMMARY

The United States District Court for the Central District of California ordered the parties to show cause why the action should not be transferred to the Southern District of Texas under 28 U.S.C. § 1404. The court noted that the plaintiff, the property, foreclosure proceedings, and alleged underlying events were located in Texas, making Texas appear to be the more appropriate forum.

CASE DETAILS

COURT	United States District Court for the Central District of California
JURISDICTION	United States District Court for the Central District of California
DECIDED	October 30, 2025
DOCKET	2:25-cv-04291-SRM-RAO
DISPOSITION	other
PROCEDURAL POSTURE	The district court sua sponte issued an order to show cause why the action should not be transferred to the Southern District of Texas for improper venue and convenience under 28 U.S.C. § 1404(a).
STANDARD OF REVIEW	For a transfer under 28 U.S.C. § 1404(a), the court considers whether the action might have been brought in the transferee district and whether convenience of the parties and witnesses and the interests of justice favor transfer. A court may consider transfer sua sponte after giving the parties an opportunity to present their views.
PRECEDENTIAL VALUE	unpublished
PARTIES	Saran Adams v. Velocity Commercial Capital, LLC

TOPICS

- venue
- forum non conveniens
- civil procedure
- injunctions
- declaratory judgment

PRACTICE AREAS

- civil procedure
- real estate
- remedies

QUESTIONS PRESENTED

1. Whether the court may sua sponte consider transferring the action under 28 U.S.C. § 1404(a) after giving the parties an opportunity to respond.
2. Whether the location of the property, alleged foreclosure activity, lis pendens, and related events in Texas support transferring the case to the Southern District of Texas.

HOLDINGS

1. A district court may transfer a civil action sua sponte under 28 U.S.C. § 1404(a), provided that the parties are first given an opportunity to present their views on the proposed transfer.
2. The allegations indicate that a substantial part of the events giving rise to Plaintiff's claims occurred in Texas and that the Southern District of Texas appears to be the appropriate forum for the action, warranting an order to show cause regarding transfer.

KEY QUOTATIONS

“A transfer of venue pursuant to § 1404(a) may be made by motion of either party or by the court sua sponte, so long as the parties are first given the opportunity to present their views on the issue.” (at 2)

FACTUAL BACKGROUND

Plaintiff, a Texas resident, brought claims concerning real property located in Houston, Texas, including allegations involving mortgage securitization, disclosure violations, fraud, conversion, and threatened foreclosure. The complaint alleged that foreclosure proceedings were initiated concerning the Texas property and that a lis pendens was recorded in Harris County. Plaintiff also stated that the 129th District Court of Harris County issued a temporary restraining order on December 3, 2024, halting the last known foreclosure attempt.

PROCEDURAL HISTORY

Plaintiff filed the action in the Central District of California seeking declaratory and injunctive relief concerning Texas real property and mortgage-related conduct. The court had denied Plaintiff's motion for a preliminary injunction. Before deciding whether to transfer the case, the court ordered the parties to submit written reasons why transfer to the Southern District of Texas should not occur.

DISPOSITION

other

CASES CITED

- Decker Coal Co. v. Commonwealth Edison Co., 805 F.2d 834, 843 (9th Cir. 1986)
- Norwood v. Kirkpatrick, 349 U.S. 29, 32 (1955)
- Pavao v. Unifund CCR Partners, 934 F. Supp. 2d 1238, 1242 (S.D. Cal. 2013)
- Costlow v. Weeks, 790 F.2d 1486, 1488 (9th Cir. 1986)

