

COURT OF APPEALS OF OHIO, EIGHTH APPELLATE DISTRICT,
CUYAHOGA COUNTY

JPMorgan Chase Bank, N.A. v. Yoo

2025-Ohio-5519 · No. No. 114993 · Decided December 11, 2025

SUMMARY

The Ohio Eighth District Court of Appeals affirmed summary judgment for JPMorgan Chase Bank, N.A. on its claim for an unpaid credit-card balance of \$17,335.85. The court rejected the appellant’s jurisdictional, summary-judgment, jury-trial, pending-motion, and counterclaim arguments, including sovereign-citizen theories and challenges to the notice of appeal.

CASE DETAILS

COURT	Court of Appeals of Ohio, Eighth Appellate District, Cuyahoga County
WRITING FOR THE COURT	Michael John Ryan, J.; Eileen A. Gallagher, A.J.; Deena R. Calabrese, J.
JURISDICTION	Court of Appeals of Ohio, Eighth Appellate District, Cuyahoga County
DECIDED	December 11, 2025
DOCKET	No. 114993
DISPOSITION	affirmed
PROCEDURAL POSTURE	Defendant appealed the Cuyahoga County Court of Common Pleas' entry of summary judgment for JPMorgan Chase Bank, N.A. in a credit-card debt action. The appeal also challenged jurisdiction, the absence of a jury trial, unresolved motions, and dismissal of defendant's counterclaim.
STANDARD OF REVIEW	Summary judgment is reviewed de novo under the same standard applied by the trial court pursuant to Ohio Civ.R. 56(C).
PRECEDENTIAL VALUE	Published Ohio appellate opinion
PARTIES	Jeasung J. Yoo v. JPMorgan Chase Bank, N.A.

TOPICS

- summary judgment
- subject matter jurisdiction
- personal jurisdiction
- appellate procedure
- motions to dismiss

PRACTICE AREAS

civil procedure

appellate procedure

commercial litigation

consumer credit

QUESTIONS PRESENTED

1. Whether the common pleas court had subject-matter and personal jurisdiction over the action and Yoo.
2. Whether summary judgment was proper on JPMorgan's credit-card debt claim.
3. Whether summary judgment deprived Yoo of his right to a jury trial.
4. Whether motions on which the trial court did not expressly rule were deemed denied upon entry of final judgment.
5. Whether the appellate court could review dismissal of Yoo's counterclaim when the notice of appeal did not designate the orders dismissing the counterclaim or denying reconsideration.

HOLDINGS

1. The common pleas court had subject-matter jurisdiction over JPMorgan's claim for money owed.
2. The trial court had personal jurisdiction over Yoo, and his argument that the court lacked jurisdiction because it allegedly misidentified his legal entity and natural person was frivolous.
3. Summary judgment for JPMorgan was proper because the record established Yoo's credit-card account, use of the card, failure to make required payments, and \$17,335.85 balance, and Yoo failed to produce evidence showing a genuine issue of material fact.
4. The proper granting of summary judgment does not abridge the constitutional right to a jury trial because there are no factual issues remaining for a jury to try.
5. Any motion on which the trial court failed to rule expressly was deemed denied when the trial court entered final judgment.
6. The court declined to review Yoo's challenge to dismissal of his counterclaim because his notice of appeal did not designate the orders dismissing the counterclaim or denying reconsideration, and he did not amend the notice of appeal.

KEY QUOTATIONS

"Subject-matter jurisdiction is the power of a court to entertain and adjudicate a particular class of cases."
(Jurisdiction section)

"The right to a jury trial is only enforceable where there are factual issues to be tried." (Summary Judgment section)

FACTUAL BACKGROUND

JPMorgan issued Yoo a credit card in 2017, and Yoo used it to purchase goods and services. The account records showed that Yoo's last payment was \$1,665 on March 30, 2023, after which the account was charged off with an outstanding balance of \$17,335.85. JPMorgan supported its motion with an affidavit from an authorized signing

officer, the cardmember agreement, and billing statements; Yoo did not submit evidence creating a genuine dispute concerning the account, payment default, or balance.

PROCEDURAL HISTORY

JPMorgan filed a complaint alleging that Yoo opened and used a credit-card account, stopped making payments, and owed \$17,335.85. Yoo filed an answer, counterclaim, and numerous motions. The trial court dismissed the counterclaim, denied reconsideration and a jurisdictional motion, and granted JPMorgan's motion for summary judgment. Yoo appealed only from the summary-judgment judgment and did not designate the orders dismissing his counterclaim or denying reconsideration in his notice of appeal.

DISPOSITION

affirmed

CASES CITED

- Morris v. Turk, 2025-Ohio-2365, ¶ 36 (8th Dist.)
- Bank of Am., N.A. v. Kuchta, 2014-Ohio-4275, ¶ 19
- Pratts v. Hurley, 2004-Ohio-1980, ¶ 11
- Ohio High School Athletic Assn. v. Ruehlman, 2019-Ohio-2845, ¶ 7
- State ex rel. Marbuery-Davis v. Court of Common Pleas, 2025-Ohio-2602, ¶ 17 (8th Dist.)
- Saadi v. Am. Family Ins. Co., 2021-Ohio-2360, ¶¶ 31, 35 (7th Dist.)
- SoFi Lending Corp. v. Williams, 2024-Ohio-1166, ¶¶ 21-22 (8th Dist.)
- United States v. Benabe, 654 F.3d 753, 767 (7th Cir. 2011)
- Wells Fargo Bank, N.A. v. Lundeen, 2020-Ohio-28, ¶ 10 (8th Dist.)
- Grafton v. Ohio Edison Co., 77 Ohio St. 3d 102, 105 (1996)
- Ruf v. Belfance, 2013-Ohio-160, ¶ 8 (9th Dist.)
- Hollins v. Shaffer, 2009-Ohio-2136, ¶ 14 (8th Dist.)
- Dresher v. Burt, 75 Ohio St. 3d 280, 288-293 (1996)
- Deutsche Bank Natl. Trust Co. v. Talliere, 2023-Ohio-75, ¶ 11 (8th Dist.)
- Discover Bank v. Wyley, 2025-Ohio-104, ¶ 15 (8th Dist.)
- Univ. Carnegie Med. Partners Assocs. v. Cleveland Therapy Ctr., 1992 Ohio App. LEXIS 5243, at 17 (8th Dist. Oct. 15, 1992)
- D.C. v. J.C., 2025-Ohio-3275, ¶ 38 (8th Dist.)
- State v. Nikolic, 2020-Ohio-3718, ¶ 5 (8th Dist.)
- Huntington Natl. Bank v. Blue, 2023-Ohio-3881, ¶¶ 12-13 & fn. 1 (8th Dist.)
- Armbruster v. Hampton, 2006-Ohio-4530, ¶ 15 (9th Dist.)
- Transamerica Ins. Co. v. Nolan, 72 Ohio St. 3d 320 (1995)

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