

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

One Main Fin. Group, L.L.C. v. Knight

2026-Ohio-1660 · No. 115883 · Decided May 7, 2026

SUMMARY

The Ohio Eighth District Court of Appeals held that the Rocky River Municipal Court lacked personal jurisdiction over Alexandria L. Knight because service of the complaint by FedEx did not require a signed receipt and was sent to an address where Knight did not reside. The court concluded that the resulting default judgment was void and that Knight’s failure to object to the magistrate’s decision did not prevent plain-error review. The appellate court reversed the denial of Knight’s motion to vacate and remanded for the trial court to vacate the default judgment.

CASE DETAILS

COURT	Court of Appeals of Ohio, Eighth Appellate District, Cuyahoga County
WRITING FOR THE COURT	Eileen T. Gallagher, Presiding Judge; Eileen A. Gallagher, Judge; Timothy W. Clary, Judge
JURISDICTION	Ohio Court of Appeals, Eighth Appellate District, Cuyahoga County
DECIDED	May 7, 2026
DOCKET	115883
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Defendant appealed the Rocky River Municipal Court's denial of her motion to vacate a default judgment under Civ.R. 60(B), arguing that defective service deprived the trial court of personal jurisdiction.
STANDARD OF REVIEW	Whether a trial court has personal jurisdiction over a defendant is a question of law reviewed de novo. Because Knight did not object to the magistrate's decision, the appellate court reviewed the assigned errors for plain error, exercising its discretion to reach the jurisdictional issue.
PRECEDENTIAL VALUE	Published
PARTIES	Alexandria L. Knight v. One Main Financial Group, L.L.C.

TOPICS

service of process

personal jurisdiction

default judgment

appellate procedure

civil procedure

PRACTICE AREAS

civil procedure

appellate procedure

remedies

QUESTIONS PRESENTED

1. Whether service of the summons and complaint by commercial carrier without requiring a signed receipt complied with Civ.R. 4.1(A)(2).
2. Whether the trial court acquired personal jurisdiction over Knight when service was sent to an address where she did not reside and she did not appear or otherwise submit to the court's jurisdiction.
3. Whether a default judgment entered without effective service and personal jurisdiction is void and must be vacated.
4. Whether the appellate court could review the jurisdictional defect for plain error despite Knight's failure to object to the magistrate's decision.

HOLDINGS

1. Service by FedEx did not comply with Civ.R. 4.1(A)(2) because the delivery did not require a signed receipt and no one at the residence signed a return receipt.
2. The trial court lacked personal jurisdiction over Knight, and the default judgment entered against her was void and had to be vacated.
3. Although Knight forfeited all but plain-error review by failing to object to the magistrate's decision, the court could and did recognize plain error because the defective service was an obvious legal error that deprived her of substantial rights and affected the validity of the judgment.

KEY QUOTATIONS

“A judgment rendered without personal jurisdiction is void.” (¶ 9)

“The proper procedure for challenging a void judgment is to file a common-law motion to vacate the judgment.” (¶ 18)

“A default judgment rendered without effective service of process is a nullity and void for lack of personal jurisdiction.” (¶ 23)

“Knight’s right to due process of law was violated when the trial court entered a default judgment against her despite insufficient evidence of proper service and despite the court’s lack of personal jurisdiction.” (¶ 30)

FACTUAL BACKGROUND

One Main sued Knight on an allegedly defaulted personal loan and directed service of the complaint to a Fairview Park address by FedEx. The delivery did not require a signature, no one at the residence signed a return receipt, and Knight submitted a sworn affidavit stating that she never received the summons or complaint, had no notice of the lawsuit until after judgment, and lived in Cleveland rather than at the Fairview Park address. The

trial court entered a \$13,251.77 default judgment after Knight failed to appear for mediation and later denied her motion to vacate.

PROCEDURAL HISTORY

One Main filed a complaint against Knight for default on a personal loan in Rocky River Municipal Court. The court sent the complaint by FedEx to an address listed in the complaint without requiring a signed receipt, failed to obtain a signed return receipt, and entered a default judgment for \$13,251.77 after Knight failed to appear for mediation. Knight later moved to vacate the judgment, supported by an affidavit stating that she had not received service and had not learned of the lawsuit until after judgment. A magistrate denied the motion, the trial court adopted the decision, and Knight appealed without filing objections to the magistrate's decision.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Rocky River Municipal Court was directed to vacate the default judgment entered against Knight.

CASES CITED

- Kauffman Racing Equip., L.L.C. v. Roberts, 2010-Ohio-2551, ¶ 27
- State v. Buehner, 2021-Ohio-4435, ¶ 43 (8th Dist.)
- Mayfran Internatl., Inc. v. Eco-Modity, L.L.C., 2019-Ohio-4350, ¶ 9 (8th Dist.)
- GGNLC Lima, L.L.C. v. LMOP, L.L.C., 2018-Ohio-1298, ¶ 14 (8th Dist.)
- Patton v. Diemer, 35 Ohio St.3d 68 (1988), paragraphs three and four of the syllabus
- Shiftmed, L.L.C. v. Westchester Parkway Consulting, L.L.C., 2025-Ohio-1554, ¶¶ 19, 21, 23 (8th Dist.)
- Kassouf v. Barylak, 2023-Ohio-314, ¶¶ 18-19 (8th Dist.)
- Maryhew v. Yova, 11 Ohio St.3d 154, 156 (1984)
- King v. Water's Edge Condominium Unit Owners' Assn., 2021-Ohio-1717, ¶¶ 22-23 (8th Dist.)
- Akron-Canton Regional Airport Auth. v. Swinehart, 62 Ohio St.2d 403 (1980), syllabus
- Lauver v. Ohio Valley Selective Harvesting, L.L.C., 2017-Ohio-5777, ¶ 17 (12th Dist.)
- Motorists Mut. Ins. Co. v. Roberts, 2014-Ohio-1893, ¶ 32 (12th Dist.)
- Hook v. Collins, 2017-Ohio-976, ¶¶ 13, 15 (8th Dist.)
- TCC Mgt. v. Clapp, 2005-Ohio-4357, ¶ 11 (10th Dist.)
- McWilliams v. Schumacher, 2013-Ohio-29, ¶ 51 (8th Dist.)
- Grimm Scientific Industries, Inc. v. Foam Supplies, Inc., 2022 U.S. Dist. LEXIS 199251 (S.D. Ohio Nov. 1, 2022)
- 2222 Internatl. L.L.C. v. Law Search L.L.C., 2026-Ohio-125, ¶ 28 (8th Dist.)
- State v. Jones, State v. Jones, 2020-Ohio-3051, ¶ 17
- Rosales-Mireles v. United States, 585 U.S. 129 (2018)

- Goldfuss v. Davidson, 79 Ohio St.3d 116, 121 (1997)
- In re E.A.G., 2024-Ohio-315, ¶ 81 (4th Dist.)
- State v. Rogers, 2015-Ohio-2459, ¶ 22
- Johnson v. United States, 520 U.S. 461, 467-468 (1997)
- Schade v. Carnegie Body Co., 70 Ohio St.2d 207, 209 (1982)

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