

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
FLORIDA, TAMPA DIVISION

Joel Price v. The Individuals, Partnerships, and Unincorporated
Associations Identified on Schedule A

Price · No. 8:25-cv-3398-KKM-AEP · Decided February 4, 2026

SUMMARY

The United States District Court for the Middle District of Florida ordered Plaintiff Joel Price to show cause why all defendants except the first defendant listed on Schedule A should not be severed and dismissed. The order expressed concern that the alleged trademark infringement claims did not satisfy Federal Rule of Civil Procedure 20's requirements for permissive joinder because the complaint did not allege that the defendants were related or acted jointly.

CASE DETAILS

COURT	United States District Court for the Middle District of Florida, Tampa Division
WRITING FOR THE COURT	United States District Judge Mizelle
JURISDICTION	United States District Court for the Middle District of Florida, Tampa Division
DECIDED	February 4, 2026
DOCKET	8:25-cv-3398-KKM-AEP
DISPOSITION	other
PROCEDURAL POSTURE	The court, on its own review of a trademark-infringement complaint against 102 anonymous defendants, ordered the plaintiff to show cause why all defendants other than the first Schedule A defendant should not be severed and dismissed for improper joinder.
PRECEDENTIAL VALUE	unpublished district court order

TOPICS

- joinder
- trademark infringement
- civil procedure
- pleadings
- commercial litigation

PRACTICE AREAS

- civil procedure
- intellectual property
- trademark infringement
- commercial litigation

QUESTIONS PRESENTED

1. Whether the allegations were sufficient to establish that the 102 defendants could be joined in one action under Federal Rule of Civil Procedure 20(a)(2).
2. Whether Price should be required to show cause why defendants other than the first Schedule A defendant should not be severed and dismissed for improper joinder.

HOLDINGS

1. Rule 20(a)(2) requires both that the asserted right to relief against the defendants arise from the same transaction, occurrence, or series of transactions or occurrences, and that a common question of law or fact arise in the action.
2. Alleging that multiple defendants committed the same type of trademark or intellectual-property violation, without allegations connecting the defendants through related conduct or joint action, does not by itself satisfy Rule 20's transaction-or-occurrence requirement.

KEY QUOTATIONS

“Simply committing the same type of violation in the same way does not link defendants together for the purposes of joinder.” (Order)

“a plaintiff cannot satisfy Rule 20’s requirements merely by alleging that multiple defendants have infringed the same intellectual property.” (Order)

FACTUAL BACKGROUND

Price alleged that 102 anonymous defendants infringed the same trademark. The complaint did not allege that the defendants were related or acted jointly. The asserted commonalities were that the defendants allegedly violated the same trademark and that some products appeared similar or identical.

PROCEDURAL HISTORY

Joel Price filed a trademark-infringement action on December 12, 2025, naming 102 anonymous defendants by Seller IDs in a sealed Schedule A. Before proceeding further, the district court questioned whether the defendants were properly joined under Federal Rule of Civil Procedure 20 and issued an order requiring Price to show cause by February 6, 2026.

DISPOSITION

other

CASES CITED

- Alexander v. Fulton County, Ga., 207 F.3d 1303, 1323 (11th Cir. 2000)
- Manders v. Lee, 338 F.3d 1304 (11th Cir. 2003)
- Louis Vuitton Malletier v. Individuals, Business Entities, & Unincorporated Associations Identified on Schedule A, 2025 WL 2256518, at *1 (S.D. Fla. Feb. 28, 2025)

- *Moore v. New York Cotton Exchange*, 270 U.S. 593, 610 (1926)
- *Republic Health Corp. v. Lifemark Hospitals of Florida, Inc.*, 755 F.2d 1453, 1455 (11th Cir. 1985) (per curiam)
- *Omega, SA v. Individuals, Business Entities, & Unincorporated Associations Identified on Schedule A*, 650 F. Supp. 3d 1349, 1353 (S.D. Fla. 2023)
- *AF Holdings, LLC v. Does 1–1058*, 752 F.3d 990, 998 (D.C. Cir. 2014)
- *Tushbaby, Inc. v. Corporations, Limited Liability Companies, & Unincorporated Associations Identified on Schedule A*, 2024 WL 3741359, at *2 (S.D. Fla. Aug. 9, 2024)

OPINION

UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA TAMPA DIVISION
 JOEL PRICE, Plaintiff, v. Case No. 8:25-cv-3398-KKM-AEP THE INDIVIDUALS,
 PARTNERSHIPS, and UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE
 A., Defendants. _____ ORDER On December 12, 2025,
 Plaintiff Joel Price filed this action alleging that 102 anonymous defendants are infringing his
 trademark.

See Compl. (Doc. 1). Instead of identifying defendants by name, he filed Schedule A, (Doc. 2-1),
 under seal, which lists them by their “Seller IDs.” See Mot. to Seal (Doc. 2) at 2. Upon review of
 Schedule A and the allegations in the complaint, the Court is concerned that joinder of the
 defendants might be improper.

The Court orders Price to show cause why the defendants—aside from the first defendant listed on
 Schedule A—should not be severed and dismissed from this action. Federal Rule of Civil
 Procedure 20 provides two requirements for joining defendants in a single action.

First, “any right to relief” must be “asserted against them jointly, severally, or in the alternative
 with respect to or arising out of the same transaction, occurrence, or series of transactions or
 occurrences.” FED. R. CIV. P. 20(a)(2)(A).

Second, there must be a “question of law or fact common to all defendants [that] arise[s] in the
 action.” Id. 20(a)(2)(B). “In determining what constitutes a transaction or occurrence for the
 purposes of Rule 20(a), courts have looked for meaning to FED. R. CIV. P. 13(a) governing
 compulsory counterclaims.” *Alexander v. Fulton Cnty., Ga.*, 207 F.3d 1303, 1323 (11th Cir.

2000), overruled on other grounds by *Manders v. Lee*, 338 F.3d 1304 (11th Cir. 2003); see also
*Louis Vuitton Malletier v. Individuals, Bus. Entities, & Unincorporated Ass’ns Identified on
 Schedule “A,”* 2025 WL 2256518, at *1 (S.D. Fla. Feb. 28, 2025) (same). “[T]ransaction” is a
 “flexible” term, and “may comprehend a series of many occurrences, depending not so much upon
 the immediateness of their connection as upon their logical relationship.” *Alexander*, 207 F.3d at
 1303 (quoting *Moore v. New York Cotton Exch.*, 270 U.S. 593, 610 (1926)).

Accordingly, courts ask whether “there is a logical relationship between the underlying operative facts and the claims brought.” *Louis Vuitton*, 2025 WL 2256518, at *1. A logical relationship exists between claims “when the same operative facts serve as the basis of both claims or the aggregate core of facts upon which the claim rests activates additional legal rights, otherwise dormant, in the defendant.” *Id.* (quoting *Republic Health Corp. v. Lifemark Hosps. of Fla., Inc.*, 755 F.2d 1453, 1455 (11th Cir.

1985) (per curiam)). The complaint does not allege that the defendants are related or acted jointly. The only commonalities that Price alleges in the filings are that the defendants violated the same trademark and some of the defendants’ products appear similar or identical. See Compl.; Sch. B (Doc. 2-2). But “[s]imply committing the same type of violation in the same way does not link defendants together for the purposes of joinder.” *Omega, SA v. Individuals, Bus.*

Entities, & Unincorporated Ass’ns Identified on Schedule “A”, 650 F. Supp. 3d 1349, 1353 (S.D. Fla. 2023) (quoting *AF Holdings, LLC v. Does 1–1058*, 752 F.3d 990, 998 (D.C. Cir. 2014)). Price offers no authority to rebut the conclusion shared by many courts that “a plaintiff cannot satisfy Rule 20’s requirements merely by alleging that multiple defendants have infringed the same intellectual property.” *Tushbaby, Inc. v. Corps., Ltd. Liab.*

Cos., & Unincorporated Ass’ns Identified on Schedule A, 2024 WL 3741359, at *2 (S.D. Fla. Aug. 9, 2024) (collecting cases). In the light of these concerns, the following is ORDERED: 1. No later than February 6, 2026, Plaintiff Joel Price shall show cause why defendants—aside from the first Defendant on Schedule A—should not be severed and dismissed. ORDERED in Tampa, Florida, on February 4, 2026. ae 4 Mizelle United States District Judge