

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA

Tiffany Oliver v. Symphony Property Management LLC, et al.

Oliver · No. 1:25-cv-358 · Decided May 29, 2026

SUMMARY

The United States District Court for the Western District of Pennsylvania dismissed as moot the plaintiff’s petition for removal and change of venue and motion for enjoinder because the case had been transferred from the District of North Dakota. The court dismissed the plaintiff’s motion seeking to declare a Pennsylvania magisterial district court judgment void for lack of jurisdiction under the Rooker-Feldman doctrine.

CASE DETAILS

COURT	United States District Court for the Western District of Pennsylvania
WRITING FOR THE COURT	Susan Paradise Baxter
JURISDICTION	United States District Court for the Western District of Pennsylvania
DECIDED	May 29, 2026
DOCKET	1:25-cv-358
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court resolved Plaintiff's Petition for Removal and Change of Venue, Motion for Enjoinder of Claims, and Rule 60 motion by memorandum order.
PRECEDENTIAL VALUE	nonprecedential

TOPICS

subject matter jurisdiction landlord tenant venue joinder civil procedure

PRACTICE AREAS

civil procedure real estate landlord tenant remedies

QUESTIONS PRESENTED

- Whether Plaintiff's Petition for Removal and Change of Venue and Motion for Enjoinder of Claims were moot after the District of North Dakota transferred the case to the Western District of Pennsylvania.

2. Whether the federal district court had jurisdiction to review and declare void a prior Pennsylvania Magisterial District Court judgment.

HOLDINGS

1. The Petition for Removal and Change of Venue and Motion for Enjoinder of Claims were moot because they were directed to the District of North Dakota, which had already transferred the case to the Western District of Pennsylvania.
2. The Rooker-Feldman doctrine deprived the federal district court of jurisdiction over Plaintiff's request to declare the state-court judgment void because Plaintiff lost in state court, complained of injuries caused by that judgment, the judgment predated the federal action, and the requested relief invited federal review and rejection of the state judgment.

KEY QUOTATIONS

“under the Rooker-Feldman doctrine, a federal district court may not exercise jurisdiction over “cases brought by state-court losers complaining of injuries caused by state-court judgments rendered before the district court proceedings commenced and inviting district court review and rejection of those judgments.””

(Memorandum Order)

“Accordingly, Plaintiff’s motion at ECF No. [2] must be, and here is, DISMISSED for lack of jurisdiction.”

(Memorandum Order)

FACTUAL BACKGROUND

A Pennsylvania Magisterial District Court entered a judgment against Plaintiff on September 18, 2025, in a landlord-tenant dispute. Plaintiff then sought an order from the federal district court declaring that state-court judgment void ab initio, alleging that it was entered without subject-matter jurisdiction. Plaintiff's motions for removal and change of venue and for enjoinder were directed to the District of North Dakota, but that court transferred the case to the Western District of Pennsylvania.

PROCEDURAL HISTORY

Plaintiff's motions for removal and change of venue and for enjoinder were filed in and directed to the District of North Dakota, which transferred the case to the Western District of Pennsylvania. Plaintiff separately sought to have a Pennsylvania Magisterial District Court judgment in a landlord-tenant dispute declared void ab initio. The Western District of Pennsylvania dismissed the first two motions as moot and dismissed the Rule 60 motion for lack of subject-matter jurisdiction under the Rooker-Feldman doctrine.

DISPOSITION

dismissed

CASES CITED

- Exxon Mobil Corp. v. Saudi Basic Industries Corp., 544 U.S. 280, 284 (2005)

- Pavlenko v. Wilmington Savings Fund Society, No. CV 25-3090, 2026 WL 1083786, at *2 (D.N.J. Apr. 22, 2026)
- Great W. Mining & Mineral Co. v. Fox Rothschild LLP, 615 F.3d 159, 166 (3d Cir. 2010)

OPINION

Oliver

PER CURIAM.

IN THE UNITED STATES DISTRICT COURT

FOR THE WESTERN DISTRICT OF PENNSYLVANIA

TIFFANY OLIVER,)

Plaintiff,) Case No. 1:25-cv-358 V.))

SYMPHONY PROPERTY)

MANAGEMENT LLC, et al.,) Defendants.

MEMORANDUM ORDER

NOW, this 29th day of May, 2026, IT IS ORDERED that Plaintiff's Petition for Removal and Change of Venue [6], and Motion for Enjoinder of claims [7] in the above-captioned matter are DISMISSED as moot. These motions were filed in, and directed to, the United States District Court for the District of North Dakota, which has since transferred Plaintiffs case to this judicial district. Therefore, any request by Plaintiff for the district court in North Dakota to join and assume jurisdiction over her pending civil matters is moot. IT IS FURTHER ORDERED that Plaintiff's Motion to Declare State Magisterial Court Judgment Void Ab Initio (Rule 60), ECF No. [2], is DISMISSED for lack of jurisdiction. In that motion, Plaintiff requests "an order declaring the judgment entered against [her] on September 18, 2025, in the Pennsylvania Magisterial District Court, Docket No. MJ-06303-LT-0000099- 2025, to be void ab initio." See ECF No. 2 at 1. However, under the Rooker-Feldman doctrine, a federal district court may not exercise jurisdiction over "cases brought by state-court losers complaining of injuries caused by state-court judgments rendered before the district court proceedings commenced and inviting district court review and rejection of those judgments." *Exxon Mobil Corp. v. Saudi Basic Indust. Corp.*, 544 U.S. 280, 284 (2005); see also *Pavlenko vy. Wilmington Sav. Fund Soc'y*, No. CV 25-3090, 2026 WL 1083786, at *2 (D.N.J. Apr. 22, 2026). Plaintiff's motion at ECF No. [2] makes clear that she is complaining about injuries resulting from an adverse judgment entered against her in a landlord-tenant dispute that was filed in a - Pennsylvania magisterial district justice court. See ECF No. 2, §§7, 13-14. The judgment was entered on September 18, 2025, prior to the date her pending federal case was filed. See *id.* at 913; ECF No. 5-5 at 2. Plaintiff's motion invites the federal district court to review her state court judgment and reject it on the grounds that it was entered in the absence of subject-matter jurisdiction. See ECF No. 2, J§16, 31-34; see also *id.* at §5 (asking the federal district court to declare the state court judgment "void and of no legal force or effect"). The Rooker-Feldman doctrine precludes this Court from granting the relief Plaintiff requests in her

Motion at ECF No.

2. See Pavlenko, *supra*, 2026 WL 1083786, at *2 (noting that the Rooker-Feldman doctrine applies where: “(1) the federal plaintiff lost in state court; (2) the plaintiff complain[s] of [REDACTED] caused by [the] state-court judgments; (3) those judgments were rendered before the federal suit was filed; and (4) the plaintiff is inviting the district court to review and reject the state judgments.”) (quoting *Great W. Mining & Mineral Co. v. Fox Rothschild LLP*, 615 F.3d 159, 166 (3d Cir. 2010)) (internal quotation marks omitted; alteration in the original). Accordingly, Plaintiff’s motion at ECF No. [2] must be, and here is, DISMISSED for lack of jurisdiction. | SO. ORDERED this 29th day of May, 2026.

SUSAN PARADISE BAXTER

United States District Judge