

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PRECEDENTIAL VALUE	nonprecedential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)

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