

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

Arthur Reid Stephenson, et al. v. Jaguar Land Rover North America, LLC, et al.

No. 25-cv-07732-NC, United States District Court for the Northern District of California (September 12, 2025)

SUMMARY

The United States District Court for the Northern District of California ordered Jaguar Land Rover North America, LLC to show cause why the action should not be remanded to state court for lack of subject matter jurisdiction. The court concluded that the removal papers sufficiently established the amount in controversy but failed to allege the plaintiffs’ state citizenship, as distinct from their residency, for purposes of diversity jurisdiction. Defendant was directed to respond by September 26, 2025, and plaintiffs could respond by October 3, 2025.

CASE DETAILS

|                       |                                                                                                                                                                                                           |
|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Northern District of California                                                                                                                                      |
| WRITING FOR THE COURT | Nathanael M. Cousins                                                                                                                                                                                      |
| JURISDICTION          | United States District Court for the Northern District of California                                                                                                                                      |
| DECIDED               | September 12, 2025                                                                                                                                                                                        |
| DOCKET                | 25-cv-07732-NC                                                                                                                                                                                            |
| DISPOSITION           | other                                                                                                                                                                                                     |
| PROCEDURAL POSTURE    | Defendant removed the action from the Santa Clara County Superior Court and the district court issued an order to show cause why the case should not be remanded for lack of subject matter jurisdiction. |
| PRECEDENTIAL VALUE    | unknown                                                                                                                                                                                                   |

TOPICS

- subject matter jurisdiction
- civil procedure
- interstate disputes

PRACTICE AREAS

- civil procedure
- removal jurisdiction
- diversity jurisdiction

QUESTIONS PRESENTED

1. Whether the removal papers sufficiently established federal diversity subject matter jurisdiction by alleging the plaintiffs' citizenship.
2. Whether the case should be remanded for lack of subject matter jurisdiction.

#### HOLDINGS

1. For purposes of diversity jurisdiction, the citizenship of a natural person is determined by domicile rather than residence; allegations of residence alone are insufficient to establish citizenship.
2. The removing defendant did not establish federal subject matter jurisdiction because it failed to provide sufficient facts alleging the plaintiffs' state citizenship; the defendant therefore was required to show cause why the action should not be remanded.

#### KEY QUOTATIONS

*“The natural person’s state citizenship is then determined by her state of domicile, not her state of residence.”*  
(1)

*“Federal courts are courts of limited jurisdiction.”* (1)

#### FACTUAL BACKGROUND

Plaintiffs brought an action in Santa Clara County Superior Court, which defendant Jaguar Land Rover North America, LLC removed to federal court. The removal papers relied on plaintiffs' residence to assert diversity jurisdiction but did not allege where the plaintiffs were domiciled. The court found that the amount-in-controversy threshold was adequately supported but that complete diversity could not be assessed from the allegations.

#### PROCEDURAL HISTORY

Jaguar Land Rover North America, LLC removed the case to the Northern District of California on September 11, 2025. The court concluded that the removal papers sufficiently established the amount-in-controversy requirement but failed to allege facts establishing the plaintiffs' state citizenship or domicile, and ordered the removing defendant to show cause by September 26, 2025, with plaintiffs permitted to respond by October 3, 2025.

#### DISPOSITION

other

#### REMAND INSTRUCTIONS

Jaguar Land Rover North America, LLC must file a written response by September 26, 2025, explaining why the case should not be remanded to state court for lack of subject matter jurisdiction. Plaintiffs may respond by October 3, 2025.

#### CASES CITED

- Kokkonen v. Guardian Life Ins. Co. of Am., 511 U.S. 375, 377 (1994)
- Kanter v. Warner-Lambert Co., 265 F.3d 853, 857 (9th Cir. 2001)

#### INSTRUCTIONS FOR AN AI ASSISTANT

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