

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Gillian Denali Griffin v. General Motors, LLC, et al.

Griffin v. General Motors · No. CV 25-8160-GW-PDx · Decided November 14, 2025

SUMMARY

The United States District Court for the Central District of California denied Plaintiff Gillian Denali Griffin’s motion to remand and vacated the scheduled hearing. The court held that the First Amended Complaint did not, on its face, establish federal-question jurisdiction under the Magnuson-Moss Warranty Act or diversity jurisdiction because it alleged no jurisdictional amount and pleaded residence rather than citizenship. The court further held that information available to the defendant outside the complaint did not trigger the 30-day removal period.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	George H. Wu
JURISDICTION	United States District Court for the Central District of California
DECIDED	November 14, 2025
DOCKET	CV 25-8160-GW-PDx
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved to remand a removed civil action, arguing that the removal was untimely and that the jurisdictional amount in controversy could not be established. The district court denied the motion and vacated the hearing.
STANDARD OF REVIEW	A motion to remand based on removal timeliness is governed by 28 U.S.C. § 1446(b)(1). The removing defendant bears the burden of establishing the amount in controversy by a preponderance of the evidence, but the onset of the thirty-day removal period depends on whether removability is ascertainable from the complaint or a later qualifying paper.
PRECEDENTIAL VALUE	Unpublished district court order; persuasive authority only
PARTIES	Gillian Denali Griffin v. General Motors, LLC, et al.

TOPICS

subject matter jurisdiction

civil procedure

consumer protection

commercial litigation

PRACTICE AREAS

Civil procedure

Federal jurisdiction

Removal and remand

Consumer protection

QUESTIONS PRESENTED

1. Whether General Motors's removal was untimely because the First Amended Complaint revealed a basis for federal jurisdiction on its face.
2. Whether information in General Motors's possession or investigatory efforts outside the First Amended Complaint triggered the thirty-day removal period.
3. Whether the First Amended Complaint established federal jurisdiction under the Magnuson-Moss Warranty Act or diversity jurisdiction.

HOLDINGS

1. Removal was not untimely because the First Amended Complaint did not, on its face, reveal a basis for federal jurisdiction. It alleged no dollar amount, did not satisfy the Magnuson-Moss Warranty Act's \$50,000 jurisdictional threshold, and alleged residence rather than citizenship for purposes of diversity jurisdiction.
2. A defendant has no obligation to conduct investigatory efforts or rely on documents outside an indeterminate complaint to start the removal period. Access to documents containing a jurisdictional clue does not trigger the thirty-day deadline when the pleading itself does not establish removability.

KEY QUOTATIONS

“Satisfaction of an evidentiary burden and the onset of the removal period are two separate issues.” (at 4)

“A defendant has no obligation to kick-start its removal window by making investigatory efforts or considering materials outside the face of the complaint.” (at 4)

FACTUAL BACKGROUND

The First Amended Complaint asserted a claim under the Magnuson-Moss Warranty Act and other claims concerning a vehicle, but alleged no specific dollar amount and pleaded Plaintiff's residence rather than citizenship. General Motors removed based on diversity jurisdiction and relied on information beyond the face of the pleading to establish the jurisdictional requirements. Plaintiff argued that General Motors had access to documents, including a vehicle invoice, that should have caused it to remove earlier.

PROCEDURAL HISTORY

General Motors removed the action on August 29, 2025, invoking diversity jurisdiction under 28 U.S.C. § 1332(a)(1). Griffin moved to remand on September 26, 2025. The court held that the only issue properly presented was the timeliness of removal, concluded that the First Amended Complaint did not reveal a basis for removal on its face, denied the motion, and vacated the scheduled hearing.

DISPOSITION

other

CASES CITED

- Harris v. Bankers Life & Cas. Co., 425 F.3d 689, 695 (9th Cir. 2005)
- Murphy Bros., Inc. v. Michetti Pipe Stringing, Inc., 526 U.S. 344, 347-48 (1999)
- Shoner v. Carrier Corp., 30 F.4th 1144, 1147 (9th Cir. 2022)
- Kelly v. Fleetwood Enters., Inc., 377 F.3d 1034, 1037 (9th Cir. 2004)
- Guglielmino v. McKee Foods Corp., 506 F.3d 696, 701 (9th Cir. 2007)
- Ibarra v. Manheim Invs., Inc., 775 F.3d 1193, 1199 (9th Cir. 2015)
- Arias v. Residence Inn by Marriott, 936 F.3d 920, 927 (9th Cir. 2019)
- Kanter v. Warner-Lambert Co., 265 F.3d 853, 857 (9th Cir. 2001)
- Kuxhausen v. BMW Fin'l Servs. NA LLC, 707 F.3d 1136, 1141 & n.3 (9th Cir. 2013)
- Kenny v. Wal-Mart Stores, Inc., 881 F.3d 786, 790-91 (9th Cir. 2018)
- Carvalho v. Equifax Info. Servs., LLC, 629 F.3d 876, 886 (9th Cir. 2010)

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