

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

James Metz v. Jerilyn Brown

No. 5:24-cv-02112-SSS-SPx, United States District Court for the Central District of California (August 19, 2025)

SUMMARY

The United States District Court for the Central District of California dismissed James Metz’s action against Jerilyn Brown without prejudice for lack of subject matter jurisdiction. The court concluded that the complaint did not establish federal-question or diversity jurisdiction because it alleged Fourteenth Amendment violations by a private individual without asserting state action or state authority.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Sunshine S. Sykes
JURISDICTION	United States District Court for the Central District of California
DECIDED	August 19, 2025
DOCKET	5:24-cv-02112-SSS-SPx
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court sua sponte ordered Plaintiff to show cause why the action should not be dismissed for lack of subject matter jurisdiction after denying Defendant's motion to dismiss without prejudice and while pending motions concerning default and default judgment remained unresolved.
STANDARD OF REVIEW	The court independently examined whether subject matter jurisdiction existed and required Plaintiff to carry the burden of establishing jurisdiction.
PRECEDENTIAL VALUE	unpublished district court opinion; nonprecedential

TOPICS

- subject matter jurisdiction
- civil procedure
- fourteenth amendment
- state action
- title disputes

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the district court had federal-question jurisdiction under 28 U.S.C. § 1331 based on Plaintiff's Fourteenth Amendment claims and alleged challenges to the constitutionality of California statutes.
2. Whether the absence of allegations that Defendant was a state actor or acted under state authority defeated Plaintiff's asserted Fourteenth Amendment claims and federal-question jurisdiction.
3. Whether the action should be dismissed without prejudice for failure to establish subject matter jurisdiction.

HOLDINGS

1. A federal district court must independently determine whether subject matter jurisdiction exists, even when no party has properly challenged jurisdiction.
2. Plaintiff failed to establish federal-question jurisdiction because the amended complaint did not allege that Defendant was a state actor or acted under state authority, and Fourteenth Amendment claims require state action.
3. The action was dismissed without prejudice because Plaintiff failed to carry his burden of establishing subject matter jurisdiction.

KEY QUOTATIONS

“have an independent obligation to determine whether subject-matter jurisdiction exists, even in the absence of a challenge from any party.” (546 U.S. at 514)

“apply only to state action and not to ‘individual invasion of individual rights.’” (441 F.2d at 1118)

“clothed with the authority of the state and purporting to act thereunder.” (301 F.2d at 639)

FACTUAL BACKGROUND

The action arose from a private property dispute involving Defendant's asserted claim to title and possession of property. Plaintiff sought a declaration that Defendant was an involuntary trustee and that Defendant's conduct violated Plaintiff's Fourteenth Amendment rights. The pleadings did not allege that Defendant was a state actor or acted under state authority.

PROCEDURAL HISTORY

Plaintiff filed an action seeking declaratory relief concerning title and possession of private property, alleging that Defendant was an involuntary trustee and had violated his Fourteenth Amendment rights. Defendant moved to dismiss, but the court denied the motion without prejudice for failure to comply with Local Rule 7-3. After Plaintiff moved for default judgment and Defendant moved to vacate the entry of default, the court issued an order to show cause regarding subject matter jurisdiction. Plaintiff responded, and the court dismissed the action without prejudice for lack of subject matter jurisdiction.

DISPOSITION

dismissed

CASES CITED

- Arbaugh v. Y&H Corp., 546 U.S. 500, 514 (2006)
- Martin v. Pac. Nw. Bell Tel. Co., 441 F.2d 1116, 1118 (9th Cir. 1971)
- Marshall v. Sawyer, 301 F.2d 639 (9th Cir. 1962)

OPINION

James Metz v. Jerilyn Brown

PER CURIAM.

UNITED STATES DISTRICT COURT JS-6

CENTRAL DISTRICT OF CALIFORNIA

CIVIL MINUTES—

GENERAL

Case No. 5:24-cv-02112-SSS-SPx Date August 19, 2025 Title James Metz v. Jerilyn Brown
Present: The Honorable SUNSHINE S. SYKES, UNITED STATES DISTRICT JUDGE Irene
Vazquez Not Reported Deputy Clerk Court Reporter Attorney(s) Present for Plaintiff(s):
Attorney(s) Present for Defendant(s): None Present None Present Proceedings: (IN CHAMBERS)
ORDER DISMISSING CASE FOR
LACK OF SUBJECT MATTER JURISDICTION [DKT. 57]

This case arises from a private property dispute between Plaintiff James Metz and Defendant Jerilyn Brown. Plaintiff seeks declaratory relief finding that Defendant is an involuntary trustee and Defendant's claim to title and possession of the property at issue violates his Fourteenth Amendment Rights. [Dkt. 1 at 6; Dkt. 18 at 4–5]. Defendant previously filed a motion to dismiss, arguing Plaintiff's claims were not ripe, failed to state claims upon which relief could be granted, and that this Court should decline to exercise supplemental jurisdiction over the state law claims. [See Dkt. 28]. Because Defendant failed to comply with Local Rule 7-3 in filing the motion, this Court denied Defendant's motion without prejudice. [Dkt. 37]. Plaintiff subsequently moved for entry of default judgment against Defendant. [Dkt. 47]. Defendant filed a motion to vacate the entry of default. [Dkt. 49]. After reviewing the parties' motions, this Court ordered Plaintiff to show cause why this action should not be dismissed for lack of subject matter jurisdiction. [Dkt. 57]. Plaintiff submitted his response on July 24, 2025. [Dkt. 58]. Having reviewed the parties' arguments, relevant legal authority, and record in this case, this case is DISMISSED for lack of subject matter jurisdiction. Federal district courts "have an independent obligation to determine whether subject-matter jurisdiction exists, even in the absence of a challenge from any party." Arbaugh v. Y&H Corp., 546 U.S. 500, 514 (2006). Plaintiff's response to the OSC states that this

Court has subject-matter jurisdiction over this case under § 1331 because the amended complaint alleges violations of his constitutional rights under the Fourteenth Amendment and because he seeks to challenge the constitutionality of California state statutes. [Dkt. 58 at 2]. However, Plaintiff's assertion alone does not sufficiently demonstrate that subject-matter jurisdiction exists in this case from the face of the complaint. Fourteenth Amendment claims "apply only to state action and not to 'individual invasion of individual rights.'" *Martin v. Pac. Nw. Bell Tel. Co.*, 441 F.2d 1116, 1118 (9th Cir. 1971). Thus, violation of such constitutional rights is actionable, under federal law, only when committed by one who is "clothed with the authority of the state and purporting to act thereunder." *Marshall v. Sawyer*, 301 F.2d 639 (9th Cir. 1962). The amended complaint neither asserts that Defendant is a state actor, nor does any pleading reflect that Defendant acts under state authority. Consequently, there is no assertion of federal question or diversity jurisdiction. For the above reasons, because Plaintiff has failed to carry his burden of showing subject matter jurisdiction exists, this case is DISMISSED WITHOUT PREJUDICE. IT IS SO ORDERED.