

A man and a woman bicycling on a road were both struck by a driver who was texting on his phone. The man and the woman filed a negligence action in federal district court. The man, who suffered severe injuries, claimed \$80,000 in medical damages. The woman suffered minor injuries and requested \$2,000 in medical damages. The man and the woman are citizens of State A, and the driver is a citizen of State B. The driver moved to dismiss the woman's claim for lack of subject-matter jurisdiction.

Should the driver's motion be granted?

- A. No, because the court has absolute discretion to exercise supplemental jurisdiction over the woman's claim.
- B. No, because the woman's claim arises out of a common nucleus of operative facts with the man's claim.
- C. Yes, because the woman's claim does not meet the amount-in-controversy requirement.
- D. Yes, because the woman's claim would contaminate diversity of citizenship.

## Explanation:

Federal district courts have **original subject-matter jurisdiction** over disputes that fall within either:

- **federal-question jurisdiction** – the dispute arises under the U.S. Constitution, a federal treaty, or a federal law (not seen here) *or*
- **diversity jurisdiction** – the opposing parties are **citizens** of different states and the amount in controversy exceeds \$75,000.

Here, the man and the woman (State A citizens) are diverse from the driver (State B citizen), but only the man's \$80,000 claim meets the amount-in-controversy requirement (**Choice C**).\* Therefore, the federal court has diversity jurisdiction over the man's claim—but not the woman's claim.

However, when a dispute involves multiple claims and only some fall within the court's original subject-matter jurisdiction (as seen here), the court may exercise **supplemental jurisdiction** over the other claims (**Choice A**). This is generally permitted when these supplemental claims share a **common nucleus of operative facts** (here, the automobile accident) with a **claim within** the court's **original subject-matter jurisdiction**. But when that claim is based solely on **diversity jurisdiction**, supplemental jurisdiction is **not permitted** if a supplemental claim:

- would **contaminate diversity** of citizenship—not seen here because the woman and the driver are citizens of different states (**Choice D**)—*or*
- seeks **\$75,000 or less** and is **made by a plaintiff** (1) against **parties added** through joinder, intervention, or impleader or (2) **seeking to join** through compulsory joinder or intervention—neither of which is seen here.

Therefore, the court has supplemental jurisdiction over the woman's claim, and the driver's motion to dismiss that claim should be denied.

\*The woman cannot satisfy the amount-in-controversy requirement by **aggregating** (ie, combining) her claim with the man's claim. That is because multiple plaintiffs cannot aggregate their claims to meet this requirement unless they seek to enforce a single title or right to a common or undivided interest (eg, wrongful death action by surviving beneficiaries).

## Educational objective:

A federal court may generally exercise supplemental jurisdiction over claims that fall outside its original subject-matter jurisdiction when those claims share a common nucleus of operative facts with a claim that falls within its original subject-matter jurisdiction.

## References

- 28 U.S.C. §1367 (supplemental jurisdiction).
- Exxon Mobil Corp. v. Allapattah Servs., 545 U.S. 546, 560 (2005) (explaining supplemental jurisdiction).

Copyright © UWorld. All rights reserved.

### Subject-matter jurisdiction

