

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH

R&L Carriers Shared Services, LLC v. Utah Labor Commission and
Jaceson Maughan

R&L Carriers · No. 2:25-cv-00335-JNP-DBP · Decided March 25, 2026

SUMMARY

The United States District Court for the District of Utah grants the Utah Labor Commission and its commissioner’s motion to dismiss R&L Carriers Shared Services, LLC’s challenge to Utah’s occupational-safety administrative process. The court holds that the Seventh Amendment has not been incorporated against the states and therefore cannot support the plaintiff’s claims concerning a jury trial in state administrative proceedings or its related 42 U.S.C. § 1983 claim. The court declines supplemental jurisdiction over the Utah constitutional claim and dismisses the remaining declaratory and injunctive relief claim.

CASE DETAILS

COURT	United States District Court for the District of Utah
WRITING FOR THE COURT	Jill N. Parrish
JURISDICTION	United States District Court for the District of Utah
DECIDED	March 25, 2026
DOCKET	2:25-cv-00335-JNP-DBP
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff brought federal constitutional and 42 U.S.C. § 1983 claims challenging the absence of a jury-trial right in Utah Occupational Safety and Health Act administrative proceedings. Defendants moved to dismiss under Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6). The court treated the motion as one under Rule 12(b)(6), dismissed the federal claims, declined supplemental jurisdiction over the state constitutional claim, and dismissed the remaining declaratory and injunctive-relief claim.

STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded factual allegations as true and views them in the light most favorable to the plaintiff, but the complaint must contain sufficient factual matter to state a plausible claim for relief. The court treated the jurisdictional issue as intertwined with the merits and therefore treated the motion as one under Rule 12(b)(6).
PRECEDENTIAL VALUE	unpublished district court memorandum decision; precedential status unknown
PARTIES	R&L Carriers Shared Services, LLC v. Utah Labor Commission, Jaceson Maughan

TOPICS

constitutional law

section 1983

motions to dismiss

federalism

civil rights

PRACTICE AREAS

constitutional law

civil rights

administrative law

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civil procedure

QUESTIONS PRESENTED

1. Whether the Seventh Amendment applies to the states through the Fourteenth Amendment and provides a jury-trial right in the Utah Labor Commission's administrative proceedings.
2. Whether the alleged denial of a Seventh Amendment jury-trial right supports a claim under 42 U.S.C. § 1983.
3. Whether the court should exercise supplemental jurisdiction over Plaintiff's claim that the Utah Occupational Safety and Health Act violates the Utah Constitution.
4. Whether Plaintiff was entitled to declaratory or injunctive relief after dismissal of the underlying federal and state claims.

HOLDINGS

1. The Seventh Amendment does not apply to individual states and has not been incorporated through the Fourteenth Amendment.
2. Because the Seventh Amendment does not apply to the states, Plaintiff's allegation that Defendants violated a Seventh Amendment right by enforcing the Utah Occupational Safety and Health Act cannot support its § 1983 claims.
3. The court declined to exercise supplemental jurisdiction over Plaintiff's state constitutional claim after dismissing the federal claims.

KEY QUOTATIONS

“The Seventh Amendment to the United States Constitution provides that “[i]n Suits at common law, where the value in controversy shall exceed twenty dollars, the right of trial by jury shall be preserved” (at 4)

“The court thus follows, as required, the long-standing, controlling precedent that the Seventh Amendment does not apply to the states and has not been incorporated.” (at 5)

FACTUAL BACKGROUND

R&L Carriers operates in Utah and is subject to the Utah Occupational Safety and Health Act. After an employee was injured when a forklift fell from a loading dock following the premature removal of a trailer, UOSH investigated and issued R&L a citation. R&L contested the citation and argued that the incident resulted from unpreventable employee misconduct. The resulting Utah Labor Commission administrative proceedings did not provide for a jury trial and were stayed pending this action.

PROCEDURAL HISTORY

UOSH issued Plaintiff a citation after investigating a workplace forklift accident. Plaintiff contested the citation, and the Utah Labor Commission initiated formal adjudicative proceedings, which were stayed pending resolution of this federal action. Defendants moved to dismiss. The district court granted the motion, dismissed the federal claims under Rule 12(b)(6), declined to exercise supplemental jurisdiction over the Utah constitutional claim, and dismissed the remaining claim for declaratory and injunctive relief.

DISPOSITION

dismissed

CASES CITED

- Port City Props. v. Union Pac. R.R. Co., 518 F.3d 1186, 1189 (10th Cir. 2008)
- Holt v. United States, 46 F.3d 1000, 1003 (10th Cir. 1995)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Burnett v. Mortg. Elec. Registration Sys., Inc., 706 F.3d 1231, 1235 (10th Cir. 2013)
- Minneapolis & St. L.R. Co. v. Bombolis, 241 U.S. 211, 217 (1916)
- Gasperini v. Ctr. for Humans., Inc., 518 U.S. 415, 418 (1996)
- McDonald v. City of Chicago, Ill., 561 U.S. 742, 765 n.13 (2010)
- Thomas v. Humboldt Cnty., California, No. 24-1180, 2025 WL 2906470, at *2 (U.S. Oct. 14, 2025)
- Gonzalez-Oyarzun v. Caribbean City Builders, Inc., 798 F.3d 26, 29-30 (1st Cir. 2015)
- United States v. Maloid, 71 F.4th 795, 808 (10th Cir. 2023)
- Rodriguez de Quijas v. Shearson/Am. Exp., Inc., 490 U.S. 477, 484 (1989)
- Stewart v. Dep't of Consumer Affs. of California, No. 21-CV-07674-KAW, 2021 WL 11586328, at *2 (N.D. Cal. Nov. 10, 2021)
- Villalpando ex rel. Villalpando v. Denver Health & Hosp. Auth., 65 F. App'x 683, 688-89 (10th Cir. 2003)
- Est. of Harshman v. Jackson Hole Mountain Resort Corp., 379 F.3d 1161, 1167-68 (10th Cir. 2004)

