

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WASHINGTON

Michael R. Ward v. Amazon.com Services LLC

Ward v. Amazon · No. C25-1671-KKE · Decided December 10, 2025

SUMMARY

The United States District Court for the Western District of Washington grants Amazon.com Services LLC's motion under Federal Rule of Civil Procedure 55(c) to set aside the Clerk's entry of default. The Court finds that Amazon's failure to respond was inadvertent rather than culpable, that Amazon presented potentially meritorious defenses, and that setting aside default would not prejudice Ward. Ward's motion for default judgment and request for fees are denied, and Amazon's answer is treated as validly filed as of October 15, 2025.

CASE DETAILS

COURT	United States District Court for the Western District of Washington
WRITING FOR THE COURT	Kymberly K. Evanson
JURISDICTION	United States District Court for the Western District of Washington
DECIDED	December 10, 2025
DOCKET	C25-1671-KKE
DISPOSITION	other
PROCEDURAL POSTURE	Amazon moved under Federal Rule of Civil Procedure 55(c) to set aside the Clerk's entry of default, while Ward moved for default judgment.
STANDARD OF REVIEW	The court applied the discretionary good-cause standard under Federal Rule of Civil Procedure 55(c), considering culpable conduct, the existence of a meritorious defense, and prejudice to the nondefaulting party.
PRECEDENTIAL VALUE	unpublished district court order; limited persuasive value
PARTIES	Amazon.com Services LLC v. Michael R. Ward

TOPICS

- default
- default judgment
- civil procedure
- arbitration
- disability discrimination

PRACTICE AREAS

civil procedure

employment law

civil rights

disability discrimination

arbitration

QUESTIONS PRESENTED

1. Whether Amazon established good cause under Federal Rule of Civil Procedure 55(c) to set aside the Clerk's entry of default.
2. Whether Amazon presented a meritorious defense to Ward's employment-related claims.
3. Whether setting aside the entry of default would prejudice Ward.
4. Whether Ward was entitled to fees or other compensation as a condition of setting aside default.

HOLDINGS

1. Amazon established good cause because its failure to respond was negligent and inadvertent rather than intentional or in bad faith, it presented facts that could constitute defenses, and Ward failed to show cognizable prejudice beyond delay and the need to litigate on the merits.
2. Amazon's failure to timely respond was not culpable because the record showed carelessness and negligence, not an intentional, devious, willful, or bad-faith failure to respond.
3. Amazon satisfied the meritorious-defense requirement by alleging facts that, if true, would constitute defenses, including legitimate non-discriminatory and non-retaliatory reasons for its actions and a binding arbitration agreement.
4. Setting aside the entry of default would not prejudice Ward because his asserted expenditure of time and the need to litigate on the merits did not constitute tangible prejudice.
5. Ward was not entitled to fees, costs, or compensation for his time because Amazon's conduct was not prolonged or egregious and did not resemble the conduct warranting sanctions in Nilsson.

KEY QUOTATIONS

“judgment by default is a drastic step appropriate only in extreme circumstances; a case should, whenever possible, be decided on the merits.” (at 2)

“simple carelessness is not sufficient to treat a negligent failure to reply as inexcusable” (at 3)

“To be prejudicial, setting aside an entry of default must result in greater harm than simply delaying the resolution of the case.” (at 6)

“Amazon’s answer to the complaint (Dkt. No. 12) shall be construed as validly and effectively filed as of October 15, 2025.” (at 8)

FACTUAL BACKGROUND

Ward, proceeding pro se, sued Amazon after working there as a software development engineer from August 2020 until 2025. He alleged disability discrimination, failure to accommodate, and Family and Medical Leave Act retaliation and interference. Although Ward served Amazon, a breakdown in Amazon's internal intake and

assignment process prevented outside counsel from receiving timely notice; counsel appeared, answered, and moved to set aside default promptly after learning of the action.

PROCEDURAL HISTORY

Ward filed claims alleging disability discrimination and failure to accommodate under the Americans with Disabilities Act and retaliation and interference under the Family and Medical Leave Act. After Ward served Amazon and Amazon failed to timely respond, the Clerk entered default under Rule 55(a). Amazon appeared and answered the next day, then moved to set aside the entry of default; Ward moved for default judgment. The court granted Amazon's motion, denied Ward's motion for default judgment as moot, denied Ward's request for fees, and directed that Amazon's answer be treated as filed as of October 15, 2025.

DISPOSITION

other

CASES CITED

- *Mendoza v. Wight Vineyard Mgmt.*, 783 F.2d 941, 945 (9th Cir. 1986)
- *U.S. v. Signed Pers. Check No. 730 of Yubran S. Mesle*, 615 F.3d 1085, 1091-95 (9th Cir. 2010)
- *Falk v. Allen*, 739 F.2d 461, 463 (9th Cir. 1984)
- *TCI Grp. Life Ins. Plan v. Knoebber*, 244 F.3d 691, 698-701 (9th Cir. 2001)
- *Egelhoff v. Egelhoff*, a minor, by and through her natural parent, Breiner, et al., *Egelhoff v. Egelhoff ex rel. Breiner*, 532 U.S. 141 (2001)
- *Morgan v. Sundance, Inc.*, 596 U.S. 411 (2022)
- *Hill v. Xerox Bus. Servs., LLC*, 59 F.4th 457, 470-71, 481 (9th Cir. 2023)
- *Bateman v. U.S. Postal Serv.*, 231 F.3d 1220, 1225 (9th Cir. 2000)
- *Hibernia Nat'l Bank v. Administracion Central Sociedad Anonima*, 776 F.2d 1277, 1280 (5th Cir. 1985)
- *Nilsson, Robbins, Dalgarn, Berliner, Carson & Wurst v. Louisiana Hydroelec*, 854 F.2d 1538, 1546-47 (9th Cir. 1988)
- *Na Pali Haweo Cmty. Ass'n v. Grande*, 252 F.R.D. 672, 675 (D. Haw. 2008)