

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Elijah Gatson, et al. v. Brooks Security Consultant Group, LLC, et al.

Gatson · No. 24-cv-02248-ABA · Decided April 13, 2026

SUMMARY

The court granted in part and denied in part Plaintiffs’ motion for sanctions and default judgment based on Defendants’ repeated failure to respond to discovery and comply with court-ordered deadlines. The court entered default judgment on liability for alleged violations of the Fair Labor Standards Act, the Maryland Wage and Hour Law, and the Maryland Wage Payment and Collection Law. Plaintiffs were awarded double their lost wages and granted leave to petition for attorneys’ fees and costs, but treble damages were denied because they presented no evidence of consequential damages.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Adam B. Abelson
JURISDICTION	United States District Court for the District of Maryland
DECIDED	April 13, 2026
DOCKET	24-cv-02248-ABA
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiffs moved for sanctions and default judgment under Federal Rule of Civil Procedure 37 based on Defendants' repeated failures to respond to discovery requests and comply with discovery deadlines and court orders.
STANDARD OF REVIEW	A district court has wide discretion to impose discovery sanctions, but its discretion is narrower when the sanction is default judgment. The court must balance enforcement of discovery obligations against the defendant's interests in a jury trial and a fair opportunity to be heard.
PRECEDENTIAL VALUE	unknown

TOPICS

- default judgment
- sanctions
- discovery dispute
- wage and hour
- flsa

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Defendants' repeated failure to respond to discovery requests and comply with court orders justified default judgment as a sanction under Federal Rule of Civil Procedure 37.
2. Whether Plaintiffs sufficiently pleaded violations of the FLSA, Maryland Wage and Hour Law, and Maryland Wage Payment and Collection Law to establish liability on default.
3. Whether Plaintiffs were entitled to treble damages under the Maryland Wage Payment and Collection Law or only double damages under the FLSA.
4. Whether Plaintiffs were entitled to attorneys' fees and costs and, if so, how those amounts should be determined.

HOLDINGS

1. Default judgment was warranted under Rule 37 because Defendants acted in bad faith, materially prejudiced Plaintiffs, presented a strong need for deterrence, failed to respond to explicit warnings, and left no less drastic sanction likely to secure compliance.
2. Plaintiffs sufficiently pleaded that they were employees rather than independent contractors, worked more than forty hours in a workweek, and were not paid the overtime wages required by the FLSA, Maryland Wage and Hour Law, and Maryland Wage Payment and Collection Law.
3. Plaintiffs were entitled to double their lost wages, but not treble damages, because they offered no evidence of consequential damages attributable to the underpayments.
4. Plaintiffs established entitlement to attorneys' fees and costs, but the amount was deferred because Plaintiffs had not yet filed a fee petition.

KEY QUOTATIONS

"The court must balance its interest in enforcing discovery orders with a defendant's interests in "trial by jury and a fair day in court." (II)

"Because the sanction of default judgment is so severe, courts do not use this sanction to rule on the merits when a party has only "general[ly] misbehav[ed]," but instead reserve it for the most "flagrant case[s]," where the compliant party's rights may be affected or where noncomplying parties have acted with "callous disregard" to their professional obligations." (III.A)

"Defendants are liable to Plaintiffs for violating the overtime provisions in the Fair Labor Standards Act, the Maryland Wage and Hour Law, and the Maryland Wage Payment and Collection Law." (IV)

FACTUAL BACKGROUND

Plaintiffs are former security guards employed by Brooks Security Consultant Group, LLC, William Brooks, and Kedrick Scribner between October 2021 and April 2025. They allege that Defendants misclassified them as independent contractors, required them to work more than forty hours on multiple occasions, and paid straight

time rather than overtime wages. Defendants repeatedly failed to respond to interrogatories and other discovery requests despite extensions, warnings, and court-ordered deadlines, and they did not appear at the sanctions hearing.

PROCEDURAL HISTORY

Plaintiffs served the amended complaint on Defendants, and defaults initially entered against Brooks Security and Kedrick Scribner were later vacated after Defendants agreed to cooperate in discovery. Defendants subsequently failed to meet multiple discovery deadlines, provided only some requested documents, ceased meaningfully participating in the case, and failed to obtain substitute counsel after their attorneys withdrew. Plaintiffs moved for sanctions and default judgment; Defendants did not oppose the motion or appear at the February 4, 2026 hearing.

DISPOSITION

other

REMAND INSTRUCTIONS

No remand. Plaintiffs may file a petition for attorneys' fees and costs, and a separate order will follow.

CASES CITED

- Patrick v. Teays Valley Trs., LLC, 297 F.R.D. 248, 267 (N.D. W. Va. 2013)
- Parker v. United States, 2016 WL 7383833, at *1 (D. Md. Dec. 20, 2016)
- Kegege v. Namesilo LLC, 2024 WL 1299998, at *5 (D. Md. Mar. 27, 2024)
- Mut. Fed. Sav. & Loan Ass'n v. Richards & Assocs., Inc., 872 F.2d 88, 92-94 (4th Cir. 1989)
- Wilson v. Volkswagen of Am., Inc., 561 F.2d 494, 503-04 (4th Cir. 1977), cert. denied, 434 U.S. 1020 (1978)
- Nat'l Hockey League v. Metro. Hockey Club Inc., 427 U.S. 639, 643 (1976)
- Marsh v. Bottoms Up Gentlemen's Club, LLC, 2025 WL 744067, at *2-*4 (D. Md. Mar. 7, 2025)
- Malhotra v. KCI Techs., Inc., 240 F. App'x 588, 590 (4th Cir. 2007)
- Hathcock v. Navistar Int'l Transp. Corp., 53 F.3d 36, 40 (4th Cir. 1995)
- Mey v. Phillips, 71 F.4th 203, 218 (4th Cir. 2023)
- Frozen Wheels, LLC v. Potomac Valley Home Med., Inc., 2024 WL 1132092, at *3 (D. Md. Mar. 15, 2024)
- Rowland v. Cal. Men's Colony, 506 U.S. 194, 202 (1993)
- Allied Colloids, Inc. v. Jadair, Inc., 139 F.3d 887 (table), 1998 WL 112719, at *1 (4th Cir. 1998)
- Perez v. Silva, 185 F. Supp. 3d 698, 706 (D. Md. 2016)
- Schultz v. Cap. Int'l Sec., Inc., 466 F.3d 298, 305-310 (4th Cir. 2006)
- Peters v. Early Healthcare Giver, Inc., 439 Md. 646, 657 (2014)
- Admiral Mortg., Inc. v. Cooper, 357 Md. 533, 543 (2000)
- Cook v. Superior Assisted Living, LLC, 2025 WL 3134594, at *4 (D. Md. Nov. 7, 2025)
- Fiallos v. Hamzah Slaughter House, LLC, 2022 WL 16540001, at *7 (D. Md. Oct. 28, 2022)

- Butler v. PP&G, Inc., 2023 WL 3580374, at *8-*9 (D. Md. May 22, 2023)
- Clancy v. Skyline Grill, LLC, 2012 WL 5409733, at *8 (D. Md. Nov. 5, 2012)
- Hensley v. Eckerhart, 461 U.S. 424, 433 (1983)

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