

UNITED STATES COURT OF APPEALS FOR THE EIGHTH CIRCUIT

Angela Kendall v. Zoltek Corporation

Kendall v. Zoltek Corp., No. 25-1411 (8th Cir. May 18, 2026) · No. 25-1411 · Decided May 18, 2026

SUMMARY

The United States Court of Appeals for the Eighth Circuit affirmed summary judgment for Zoltek Corporation in Angela Kendall’s claims under the Americans with Disabilities Act and Title VII. The court held that standing, lifting, bending, turning, and reaching were essential functions of Kendall’s production-operator position, and that she was not qualified to perform those functions with or without reasonable accommodation. The court also concluded that Kendall failed to establish the qualification element of her Title VII sex-discrimination claim.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States Court of Appeals for the Eighth Circuit                                                                                                                                                                                                          |
| WRITING FOR THE COURT | Shepherd, Circuit Judge; Kelly, Circuit Judge; Stras, Circuit Judge                                                                                                                                                                                            |
| JURISDICTION          | United States Court of Appeals for the Eighth Circuit                                                                                                                                                                                                          |
| DECIDED               | May 18, 2026                                                                                                                                                                                                                                                   |
| DOCKET                | 25-1411                                                                                                                                                                                                                                                        |
| DISPOSITION           | affirmed                                                                                                                                                                                                                                                       |
| PROCEDURAL POSTURE    | Appeal from the grant of summary judgment for the employer on ADA failure-to-accommodate and Title VII sex-discrimination claims.                                                                                                                              |
| STANDARD OF REVIEW    | Summary judgment is reviewed de novo, construing the record in the light most favorable to the nonmoving party. Summary judgment is proper when there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. |
| PRECEDENTIAL VALUE    | Published Eighth Circuit opinion; precedential.                                                                                                                                                                                                                |
| PARTIES               | Angela Kendall v. Zoltek Corporation                                                                                                                                                                                                                           |

TOPICS

- ada discrimination
- reasonable accommodation
- essential job functions
- employment discrimination
- standard of review

PRACTICE AREAS

## QUESTIONS PRESENTED

1. Whether the physical requirements of Zoltek's production-operator position, including standing for extended periods, lifting, bending, turning, reaching, and walking, were essential job functions under the ADA.
2. Whether Kendall was a qualified individual who could perform the essential functions of the production-operator position with or without reasonable accommodation.
3. Whether Kendall's alleged direct evidence of discriminatory motive precluded summary judgment on her ADA failure-to-accommodate claim.
4. Whether Kendall was qualified for purposes of establishing a prima facie case of Title VII sex discrimination.

## HOLDINGS

1. The physical requirements identified in Zoltek's written job description, including standing for extended periods or up to a 12-hour shift, lifting, bending, turning, reaching, and walking, were essential functions of the production-operator position.
2. Kendall was not a qualified individual under the ADA because, when Zoltek terminated her, she could not perform essential functions of the position, including standing for the duration of a 12-hour shift, bending, reaching, and lifting more than 10 pounds overhead, with or without reasonable accommodation.
3. Evidence of an employer's discriminatory intent or motive does not establish an ADA failure-to-accommodate claim or preclude summary judgment when the employee cannot show that she was qualified to perform the essential job functions with or without accommodation.
4. Kendall failed to establish a prima facie case of Title VII sex discrimination because she was not objectively qualified for the production-operator position under either the basic-skills or legitimate-expectations formulation.

## KEY QUOTATIONS

*"An employer does not concede that a job function is 'non-essential' simply by voluntarily assuming the limited burden associated with a temporary accommodation."* (7)

*"The failure to make reasonable accommodations in the employment of a disabled employee is a separate form of prohibited discrimination, which does not turn on the employer's intent or actual motive."* (10)

## FACTUAL BACKGROUND

Zoltek employed Kendall as a production operator at its St. Peters facility, a physically demanding position requiring standing for extended periods, including up to 12 hours, as well as lifting, bending, turning, reaching, and related tasks. After Kendall developed back pain and sciatica, Zoltek temporarily allowed her to sit occasionally, but later received medical restrictions stating that she could not stand for extended periods, bend,

crawl, reach underneath tables, or lift more than 10 pounds overhead. Zoltek placed Kendall on medical leave and terminated her employment in January 2022 after she had exhausted available leave and had no foreseeable unrestricted return-to-work date.

## PROCEDURAL HISTORY

Kendall sued her former employer in the United States District Court for the Eastern District of Missouri, alleging ADA failure to accommodate and retaliation, as well as Title VII sex discrimination. The district court granted Zoltek summary judgment on all claims. Kendall appealed the rulings on her ADA failure-to-accommodate and Title VII claims, but did not appeal the ADA retaliation ruling.

## DISPOSITION

affirmed

## CASES CITED

- Corkrean v. Drake Univ., 55 F.4th 623, 630 (8th Cir. 2022)
- Shirrell v. St. Francis Med. Ctr., 793 F.3d 881, 885 (8th Cir. 2015)
- Torgerson v. City of Rochester, 643 F.3d 1031, 1042 (8th Cir. 2011) (en banc)
- Faidley v. United Parcel Serv. of Am., Inc., 889 F.3d 933, 940-41, 943 (8th Cir. 2018) (en banc)
- Minnihan v. Mediacom Commc'ns Corp., 779 F.3d 803, 810 (8th Cir. 2015)
- Dropinski v. Douglas Cnty., 298 F.3d 704, 707-09 (8th Cir. 2002)
- Scruggs v. Pulaski Cnty., 817 F.3d 1087, 1092 (8th Cir. 2016)
- Kammueeller v. Loomis, Fargo & Co., 383 F.3d 779, 786 (8th Cir. 2004)
- Rehms v. Iams Co., 486 F.3d 353, 358 (8th Cir. 2007)
- McNeil v. Union Pac. R.R. Co., 936 F.3d 786, 790-91 (8th Cir. 2019)
- Garry Denson v. Steak 'n Shake, Inc., Denson v. Steak 'n Shake, Inc., 910 F.3d 368, 371 (8th Cir. 2018)
- Siebrecht v. Mercy Health Servs. - Iowa Corp., 163 F.4th 524, 532 (8th Cir. 2026)
- Fjellestad v. Pizza Hut of Am., Inc., 188 F.3d 944, 950 (8th Cir. 1999)
- EEOC v. Wal-Mart Stores, Inc., 477 F.3d 561, 568 (8th Cir. 2007)
- Hatchett v. Philander Smith Coll., 251 F.3d 670, 675 (8th Cir. 2001)
- Peebles v. Potter, 354 F.3d 761, 766-67 (8th Cir. 2004)
- Kellogg v. Union Pac. R.R. Co., 233 F.3d 1083, 1086 (8th Cir. 2000)
- Martinez-Medina v. Rollins, 144 F.4th 1091, 1096 (8th Cir. 2025)
- McDonnell Douglas Corp. v. Green, 411 U.S. 792 (1973)
- Gibson v. Concrete Equip. Co., Inc., 960 F.3d 1057, 1062 (8th Cir. 2020)
- McGinnis v. Union Pac. R.R., 496 F.3d 868, 874 n.2 (8th Cir. 2007)
- Kratzer v. Rockwell Collins, Inc., 398 F.3d 1040, 1046-47 (8th Cir. 2005)
- Riser v. Target Corp., 458 F.3d 817, 820 (8th Cir. 2006)

- Brady v. Walmart Stores E. I, LP, 144 F.4th 1047, 1054 (8th Cir. 2025)

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