

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA

Tracy Price v. La Grange Acquisitions d/b/a Energy Transfer
Company and Energy Transfer, LP

Price · No. 2:23cv1299 · Decided December 30, 2025

SUMMARY

The court granted Tracy Price’s petition for attorneys’ fees and costs incurred in post-arbitration proceedings in an employment-discrimination action under the Americans with Disabilities Act and the Pennsylvania Human Relations Act. The court held that the complaint established federal-question jurisdiction, that the Federal Arbitration Act did not itself provide an independent jurisdictional basis, and that Price was a prevailing party entitled to recover fees and costs under the PHRA. The court awarded \$21,565.00 in attorneys’ fees and \$402.00 in costs.

CASE DETAILS

COURT	United States District Court for the Western District of Pennsylvania
WRITING FOR THE COURT	David Stewart Cercone
JURISDICTION	United States District Court for the Western District of Pennsylvania
DECIDED	December 30, 2025
DOCKET	2:23cv1299
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for attorneys' fees and costs incurred in post-arbitration federal-court proceedings. The court granted the motion and awarded \$21,565.00 in attorneys' fees and \$402.00 in costs.
STANDARD OF REVIEW	The court considered plaintiff's entitlement to attorneys' fees and costs under the Pennsylvania Human Relations Act and Federal Rule of Civil Procedure 54(d)(1), and exercised its discretion concerning the fee and cost award.
PRECEDENTIAL VALUE	unpublished district-court memorandum order

TOPICS

- attorney fees
- costs
- subject matter jurisdiction
- arbitration
- ada / disability

PRACTICE AREAS

civil procedure

employment law

civil rights

disability discrimination

arbitration

QUESTIONS PRESENTED

1. Whether the court retained federal-question and supplemental jurisdiction to award attorneys' fees and costs for post-arbitration proceedings.
2. Whether plaintiff was a prevailing party entitled to attorneys' fees under the Pennsylvania Human Relations Act.
3. Whether plaintiff could recover the \$402 filing fee as a necessary and taxable cost under the Pennsylvania Human Relations Act and Federal Rule of Civil Procedure 54(d)(1).

HOLDINGS

1. The Federal Arbitration Act does not itself create federal subject matter jurisdiction; an independent jurisdictional basis must exist.
2. Plaintiff was a prevailing party under the PHRA and was entitled to recover reasonable attorneys' fees for post-arbitration proceedings necessary to secure enduring judicial relief.
3. The court awarded plaintiff \$21,565.00 in attorneys' fees and \$402.00 in costs incurred in the post-arbitration proceedings.

KEY QUOTATIONS

“But the FAA does not create federal subject matter jurisdiction for these filings.” (at 2)

“The jurisdiction of the court was established with the federal question presented in the complaint.” (at 4)

“The court's jurisdiction extends to an award of fees to the prevailing party for matters necessary to securing enduring judicial relief that are exclusively before this court and beyond the scope of the underlying arbitration proceeding.” (at 4)

“Plaintiff is awarded an additional amount of \$21,565.00 in attorneys fees and additional costs in the amount of \$402.00.” (at 1)

FACTUAL BACKGROUND

Plaintiff's complaint asserted an employment-discrimination claim under the Americans with Disabilities Act and a parallel claim under the Pennsylvania Human Relations Act. The parties' dispute proceeded to arbitration, after which plaintiff sought confirmation of the award and defendants sought vacatur in federal court. The court entered judgment in plaintiff's favor and plaintiff sought recovery of fees and the filing cost incurred in the post-arbitration proceedings.

PROCEDURAL HISTORY

Plaintiff brought claims under the Americans with Disabilities Act and the Pennsylvania Human Relations Act. The court compelled arbitration under the Federal Arbitration Act and stayed the case while retaining

jurisdiction. After the arbitrator issued a final award, plaintiff sought confirmation and defendants sought vacatur; the court entered an opinion and order on September 18, 2025, followed by final judgment under Federal Rule of Civil Procedure 58. Plaintiff then petitioned for attorneys' fees and costs incurred after arbitration.

DISPOSITION

other

CASES CITED

- Davidson Design & Development, Inc. v. Frison, 815 F. App'x 659 (3d Cir. 2020)
- Badgerow v. Walters, 142 S. Ct. 1310 (2022)
- Hall Street Associates, LLC v. Mattel, Inc., 552 U.S. 576, 582 (2008)
- Kokkonen v. Guardian Life Ins. Co. of America, 511 U.S. 375, 377 (1994)
- Goldman v. Citigroup Global Markets, Inc., 834 F.3d 242, 249 (3d Cir. 2016)
- Gunn v. Minton, 568 U.S. 251, 257 (2013)
- Texas State Teachers Assn. v. Garland Independent School Dist., 489 U.S. 782, 792-793 (1989)
- B.L. Harbert Intern., LLC v. Hercules Steel Co., 441 F.3d 905, 913 (11th Cir. 2006)
- Frazier v. CitiFinancial Corp., 604 F.3d 1313 (11th Cir. 2010)
- DMA Intern., Inc. v. Qwest Communications Intern., Inc., 585 F.3d 1341, 1346 (10th Cir. 2009)