

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF  
INDIANA, SOUTH BEND DIVISION

Demetrius Sloan v. Hammond Dual Hotels LLC, et al.

Sloan · No. 3:25-CV-00886-CCB-SJF · Decided March 24, 2026

SUMMARY

The United States District Court for the Northern District of Indiana denied Demetrius Sloan’s motion to proceed in forma pauperis because his complaint did not establish subject matter jurisdiction. The court concluded that Sloan had not exhausted administrative remedies for his Title VII claims and had not adequately pleaded federal-question or diversity jurisdiction for his state-law claims. The court granted leave to amend and refile by April 24, 2026, warning that failure to comply could result in dismissal.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                         |
|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Northern District of Indiana, South Bend Division                                                                                                                                                                                                  |
| WRITING FOR THE COURT | Cristal C. Brisco                                                                                                                                                                                                                                                                       |
| JURISDICTION          | United States District Court for the Northern District of Indiana, South Bend Division                                                                                                                                                                                                  |
| DECIDED               | March 24, 2026                                                                                                                                                                                                                                                                          |
| DOCKET                | 3:25-CV-00886-CCB-SJF                                                                                                                                                                                                                                                                   |
| DISPOSITION           | other                                                                                                                                                                                                                                                                                   |
| PROCEDURAL POSTURE    | A pro se plaintiff filed claims for discrimination, retaliation, and defamation together with a motion to proceed in forma pauperis. The district court screened the complaint under 28 U.S.C. § 1915(e)(2)(B) and denied in forma pauperis status, granting leave to amend and refile. |
| STANDARD OF REVIEW    | The court screened the complaint under 28 U.S.C. § 1915(e)(2)(B), applying the Rule 8 and plausibility standards and accepting well-pleaded factual allegations as true for purposes of screening.                                                                                      |
| PRECEDENTIAL VALUE    | unpublished                                                                                                                                                                                                                                                                             |

TOPICS

- subject matter jurisdiction
- title vii
- employment discrimination
- retaliation
- civil procedure

## PRACTICE AREAS

civil procedure

employment law

civil rights

administrative law

## QUESTIONS PRESENTED

1. Whether Sloan's complaint established federal-question jurisdiction over his Title VII discrimination and retaliation claims despite failing to allege exhaustion of administrative remedies.
2. Whether the Indiana civil-rights claim established federal-question jurisdiction or could proceed through supplemental jurisdiction.
3. Whether the defamation claim established diversity jurisdiction when the complaint alleged that both Sloan and Hammond Dual Hotels LLC were Indiana citizens.
4. Whether Sloan's motion to proceed in forma pauperis should be granted when the complaint failed to establish subject matter jurisdiction.

## HOLDINGS

1. A plaintiff must exhaust Title VII administrative remedies by filing charges with the EEOC and receiving a right-to-sue letter before bringing a Title VII action in federal court; because Sloan did not attach the required documents or otherwise establish exhaustion, the court lacked subject matter jurisdiction over his Title VII claims.
2. The Indiana civil-rights claim did not establish federal-question jurisdiction because it arose under Indiana law, and it could not proceed under supplemental jurisdiction absent a valid federal claim.
3. The complaint did not establish diversity jurisdiction over the defamation claim because it alleged that both Sloan and Hammond Dual Hotels LLC were Indiana citizens, defeating complete diversity.
4. The motion to proceed in forma pauperis was denied because the complaint failed to establish subject matter jurisdiction and did not state a viable claim within the court's jurisdiction.

## KEY QUOTATIONS

*“But “Title VII does not authorize the filing of suit until the plaintiff has exhausted his administrative remedies.”” (Discussion § A)*

*“To satisfy diversity jurisdiction, though, there must be complete diversity between the parties, meaning the plaintiff must be a citizen of a different state than all the defendants.” (Discussion § C)*

## FACTUAL BACKGROUND

Sloan alleged that Hammond Dual Hotels LLC terminated his employment after a February 2025 background check disclosed that he was listed on the national sex offender registry. He alleged race discrimination and retaliation under Title VII, an Indiana civil-rights claim, and defamation based on statements allegedly made during an unemployment-benefits hearing. The complaint alleged that Sloan and Hammond Dual Hotels LLC were Indiana citizens, while another defendant was based in Georgia, and sought to invoke federal-question, diversity, and supplemental jurisdiction.

## PROCEDURAL HISTORY

Sloan filed the complaint and an in forma pauperis motion on October 23, 2025. The court determined that the complaint did not adequately establish federal-question or diversity jurisdiction and denied the motion, while allowing Sloan until April 24, 2026, to amend the complaint and refile an in forma pauperis motion.

## DISPOSITION

other

## CASES CITED

- Adkins v. E.I. DuPont de Nemours & Co., 335 U.S. 331, 339 (1948)
- Hoskins v. Poelstra, 320 F.3d 761, 763 (7th Cir. 2003)
- Jones v. Phipps, 39 F.3d 158, 163 (7th Cir. 1994)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- Geinosky v. City of Chicago, 675 F.3d 743, 745 n.1 (7th Cir. 2012)
- Williamson v. Curran, 675 F.3d 432, 436 (7th Cir. 2012)
- Hill v. Potter, 352 F.3d 1142, 1145 (7th Cir. 2003)
- Chaidez v. Ford Motor Co., 937 F.3d 998, 1004 (7th Cir. 2019)
- Rush v. McDonald's Corp., 966 F.2d 1104, 1110 (7th Cir. 1992)
- Schur v. L.A. Weight Loss Ctrs., Inc., 577 F.3d 752, 758 (7th Cir. 2009)
- Poulos v. Naas Foods, Inc., 959 F.2d 69, 71 (7th Cir. 1992)

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