UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA

Luis Maria Heredia v. Target Corporation et al.

No. 5:25-cv-02661-SSS-DTBx (C.D. Cal. Dec. 10, 2025) · No. 5:25-cv-02661-SSS-DTBx · Decided December 10, 2025

SUMMARY

The Central District of California denied Plaintiff's motion to remand an employment-related action against Target Corporation. The court held that Defendant established by a preponderance of the evidence that the amount in controversy exceeded $75,000 for purposes of diversity jurisdiction, based on economic damages, emotional distress damages, and punitive damages.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Sunshine S. Sykes
JURISDICTION	United States District Court for the Central District of California
DECIDED	December 10, 2025
DOCKET	5:25-cv-02661-SSS-DTBx
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved to remand an employment-related action removed from California state court based on diversity jurisdiction, challenging whether the amount in controversy exceeded $75,000. The district court denied the motion.
STANDARD OF REVIEW	The removing defendant bears the burden of establishing the requirements for removal by a preponderance of the evidence. When the plaintiff contests the amount in controversy, the court considers the parties' proof and determines by a preponderance of the evidence whether the jurisdictional amount is satisfied. Any doubt concerning the right to removal is resolved in favor of remand.
PRECEDENTIAL VALUE	unpublished district court order; persuasive only
PARTIES	Luis Maria Heredia v. Target Corporation et al.

TOPICS

subject matter jurisdiction · civil procedure · damages · employment discrimination · wrongful termination

PRACTICE AREAS

civil procedure · employment law · federal jurisdiction · removal and remand

QUESTIONS PRESENTED

1. Whether Target established by a preponderance of the evidence that the amount in controversy exceeded $75,000 for diversity jurisdiction.
2. Whether potential mitigation of damages reduced the amount in controversy.
3. Whether emotional-distress and punitive damages could be included in calculating the amount in controversy.

HOLDINGS

1. Target met its burden of establishing that the amount in controversy exceeded $75,000. The court accepted $25,768 in economic damages and reasonably estimated emotional-distress and punitive damages at a 1:1 ratio to economic damages, producing at least $77,304 before considering attorney fees.
2. Potential mitigation of damages does not reduce the amount in controversy because mitigation is an affirmative defense.
3. Recoverable emotional-distress and punitive damages may be included in the amount in controversy, and the court reasonably estimated each category at an amount equal to the economic damages.

KEY QUOTATIONS

> *"The "notice of removal need include only a plausible allegation that the amount in controversy exceeds the jurisdictional threshold. Evidence establishing the amount is required . . . only when the plaintiff contests, or the court questions, the defendant's allegation.""* (3)

> *"Where the plaintiff contests the amount alleged in the notice of removal, "both sides submit proof and the court decides, by a preponderance of the evidence, whether the amount-in-controversy requirement has been satisfied.""* (3)

> *"Because Defendant has met its burden to establish the jurisdictional minimum in this action, the Court finds diversity jurisdiction exists over this case."* (6)

FACTUAL BACKGROUND

Plaintiff worked for Target as a part-time fulfillment worker and alleged workplace mistreatment, failure to accommodate anxiety and claustrophobia, and termination after submitting a doctor's note supporting an accommodation request. Plaintiff sought economic, noneconomic, punitive, and attorney-fee damages in state court without demanding a specific sum. Target's removal calculations included $25,768 in economic damages, emotional-distress damages, punitive damages, and attorney fees.

PROCEDURAL HISTORY

Plaintiff filed state-law claims in the San Bernardino County Superior Court on August 18, 2025. Target removed the action to the Central District of California on September 26, 2025, asserting complete diversity and an amount in controversy exceeding $75,000. Plaintiff moved to remand on October 24, 2025; after briefing, the court denied the motion.

DISPOSITION

other

CASES CITED

- Kokkonen v. Guardian Life Insurance Co. of America, 511 U.S. 375, 377 (1994)
- Ayala v. American Airlines, Inc., No. 2:23-cv-03571, 2023 WL 6534199, at *1 (C.D. Cal. Oct. 6, 2023)
- Richardson v. United States, 943 F.2d 1107, 1112 (9th Cir. 1991)
- Dart Cherokee Basin Operating Co., LLC v. Owens, 574 U.S. 81, 82 (2014)
- Emrich v. Touche Ross & Co., 846 F.2d 1190, 1195 (9th Cir. 1988)
- Jimenez v. General Motors, LLC, No. 2:23-cv-06991, 2023 WL 6795274, at *2 (C.D. Cal. Oct. 13, 2023)
- Gaus v. Miles, Inc., 980 F.2d 564, 566 (9th Cir. 1992)
- Matheson v. Progressive Specialty Insurance Co., 319 F.3d 1089, 1090 (9th Cir. 2003)
- Kroske v. U.S. Bank Corp., 432 F.3d 976, 980 (9th Cir. 2005)
- Singer v. State Farm Mutual Automobile Insurance Co., 116 F.3d 373, 376 (9th Cir. 1997)
- Dart Cherokee Basin Operating Co., LLC v. Owens, 135 S. Ct. 547, 551, 554 (2014)
- Mize-Kurzman v. Marin Community College District, 136 Cal. Rptr. 3d 259, 291 (Cal. Ct. App. 2012)
- Perez v. Alta-Dena Certified Dairy, LLC, 647 F. App'x 682, 684 (9th Cir. 2016)
- Jackson v. Compass Group U.S.A., Inc., No. CV 19-4678 PSG, 2019 WL 3493991, at *4, *6 (C.D. Cal. July 31, 2019)
- Garfias v. Team Industries Services, Inc., No. LACV1704282JAKAGRX, 2017 WL 4512444, at *5 (C.D. Cal. Oct. 10, 2017)
- Davenport v. Mutual Benefit Health & Accident Association, 325 F.2d 785, 787 (9th Cir. 1963)
- Tameny v. Atlantic Richfield Co., 27 Cal. 3d 167, 176 (1980)
- Simmons v. PCR Technology, 209 F. Supp. 2d 1029, 1033-34 (N.D. Cal. 2002)