

SUPREME COURT OF RHODE ISLAND

Dawn L. Huntley v. State of Rhode Island et al.

63 A.3d 526 (R.I. 2013) · No. 2011-397-M.P. (PC 11-558) · Decided April 12, 2013

SUMMARY

The Rhode Island Supreme Court reviewed the State’s challenge to the Superior Court’s denial of motions to dismiss and for summary judgment in an employment-discrimination action. The Court held that the plaintiff’s prior federal action had resulted in a final judgment on the merits under Federal Rule of Civil Procedure 41(b), and that res judicata barred the subsequent state-court claims. The Court therefore quashed the Superior Court’s judgment and remanded the record.

CASE DETAILS

COURT	Supreme Court of Rhode Island
WRITING FOR THE COURT	Chief Justice Paul A. Suttell; Chief Justice Suttell; Justice Goldberg; Justice Flaherty; Justice Robinson; Justice Indeglia
JURISDICTION	Rhode Island
DECIDED	April 12, 2013
DOCKET	2011-397-M.P. (PC 11-558)
DISPOSITION	quashed
PROCEDURAL POSTURE	The State of Rhode Island petitioned for a writ of certiorari to review the Superior Court's denial of its motion to dismiss and alternative motion for summary judgment in Huntley's state-law employment-discrimination action.
STANDARD OF REVIEW	On certiorari, the Court reviews the record for legal error and reverses only when the hearing justice committed an error of law. When reviewing an interlocutory denial of a motion to dismiss or summary judgment, the Court applies the standards applicable to review of the grant of the respective motion.
PRECEDENTIAL VALUE	Published Rhode Island Supreme Court opinion; precedential.
PARTIES	State of Rhode Island v. Dawn L. Huntley

TOPICS

employment discrimination

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PRACTICE AREAS

employment law

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QUESTIONS PRESENTED

1. Whether the federal court's dismissal of Huntley's earlier action operated as a final judgment on the merits under Federal Rule of Civil Procedure 41(b) and therefore barred the later state action under res judicata.
2. Whether the parties and issues in the federal and state actions were sufficiently identical, including through privity, to satisfy the elements of res judicata.
3. Whether the amended state complaint related back to the original complaint for purposes of adding defendants Coyne and Goulart.

HOLDINGS

1. The federal judgment had preclusive effect because the actions involved identity of parties, identity of issues, and finality of judgment; therefore, res judicata barred Huntley's state action.
2. The identity-of-parties requirement was satisfied because the state officials and Attorney General's Office employees were in privity with the State of Rhode Island.
3. The identity-of-issues requirement was satisfied because the state claims arose from the same transaction or series of transactions underlying Huntley's federal complaint.

KEY QUOTATIONS

“Instead, what is required is that the party had an opportunity to be heard.” (at 529)

“Accordingly, because we find identity of the parties, identity of the issues, and finality of judgment, we hold that the federal court judgment is entitled to preclusive effect.” (at 531)

FACTUAL BACKGROUND

Dawn L. Huntley, a fifty-six-year-old African-American woman, worked as a prosecutor in the Rhode Island Office of the Attorney General from 1999 until 2008. She alleged discriminatory treatment based on race and sex, including offensive remarks, denial of promotions and raises, and termination after returning from medical leave. She filed a federal action concerning the same underlying conduct, which was dismissed after she failed to oppose the defendants' motion to dismiss. She subsequently filed a state action asserting claims under the Rhode Island Fair Employment Practices Act, Rhode Island Civil Rights Act, and Whistleblowers' Protection Act.

PROCEDURAL HISTORY

Huntley first filed a substantially similar action in the United States District Court for the District of Rhode Island. The federal court granted the defendants' unopposed motion to dismiss, and Huntley did not appeal. Huntley then filed a state Superior Court action under FEPA, RICRA, and the WPA. The Superior Court denied the State's motion to dismiss and alternative motion for summary judgment, concluding that the State had not

shown that the federal judgment was final or on the merits and that the amended complaint related back. The Rhode Island Supreme Court granted certiorari and quashed the Superior Court judgment.

DISPOSITION

quashed

REMAND INSTRUCTIONS

The record was remanded to the Superior Court with the Supreme Court's decision endorsed thereon.

CASES CITED

- State v. Shepard, 33 A.3d 158, 163 (R.I. 2011)
- State v. Faria, 947 A.2d 863, 867 (R.I. 2008)
- Imperial Casualty and Indemnity Co. v. Bellini, 746 A.2d 130, 132 (R.I. 2000)
- Great American E & S Insurance Co. v. End Zone Pub & Grill of Narragansett, Inc., 45 A.3d 571, 574 (R.I. 2012)
- Generation Realty, LLC v. Catanzaro, 21 A.3d 253, 258 (R.I. 2011)
- Bossian v. Anderson, 991 A.2d 1025, 1027 (R.I. 2010)
- Carrozza v. Voccola, 962 A.2d 73, 78 (R.I. 2009)
- In re Sherman, 565 A.2d 870, 872 (R.I. 1989)
- Lennon v. Dacommed Corp., 901 A.2d 582, 590-591 (R.I. 2006)
- DiBattista v. State, 808 A.2d 1081, 1086 (R.I. 2002)
- Massachusetts School of Law at Andover, Inc. v. American Bar Association, 142 F.3d 26, 39 (1st Cir. 1998)
- Federated Department Stores, Inc. v. Moitie, 452 U.S. 394, 399 n.3 (1981)
- Angel v. Bullington, 330 U.S. 183, 190 (1947)
- Bell v. Hood, 327 U.S. 678, 682 (1946)
- AVX Corp. v. Cabot Corp., 424 F.3d 28, 30 (1st Cir. 2005)
- Acevedo-Villalobos v. Hernandez, 22 F.3d 384, 388-389 (1st Cir. 1994)

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