

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
ALABAMA

Adam Douglas Rigby v. Longleaf Machining, LLC

Rigby · No. 1:24-CV-88-TFM-M · Decided May 20, 2026

SUMMARY

The United States District Court for the Southern District of Alabama declines to continue exercising supplemental jurisdiction over the parties’ remaining Alabama state-law claims and counterclaims after dismissing all federal claims. The court concludes that dismissal without prejudice is warranted under 28 U.S.C. § 1367(c), citing comity, judicial economy, and the potentially novel issue of whether accessing an already-open email supports an Alabama invasion-of-privacy claim.

CASE DETAILS

COURT	United States District Court for the Southern District of Alabama
WRITING FOR THE COURT	Terry F. Moorer
JURISDICTION	United States District Court for the Southern District of Alabama
DECIDED	May 20, 2026
DOCKET	1:24-CV-88-TFM-M
DISPOSITION	dismissed
PROCEDURAL POSTURE	After granting summary judgment for Defendant on Plaintiff's federal claims, the court considered whether to retain supplemental jurisdiction over the remaining state-law claims and counterclaims.
STANDARD OF REVIEW	Discretionary application of supplemental jurisdiction under 28 U.S.C. § 1367(c), weighing judicial economy, convenience, fairness, and comity.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Adam Douglas Rigby v. Longleaf Machining, LLC

TOPICS

- subject matter jurisdiction
- civil procedure
- commercial litigation

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the court should continue to exercise supplemental jurisdiction over the remaining state-law claims and counterclaims after dismissing all federal claims.
2. Whether considerations including the potentially novel Alabama invasion-of-privacy issue, judicial economy, convenience, fairness, and comity favored dismissal without prejudice.

HOLDINGS

1. The court may decline to exercise supplemental jurisdiction when it has dismissed all claims over which it had original jurisdiction, subject to weighing the relevant discretionary factors.
2. The court declined to exercise supplemental jurisdiction and dismissed the remaining state-law claims and counterclaims without prejudice.

KEY QUOTATIONS

“Needless decisions of state law should be avoided as a matter of comity and to promote justice between the parties by procuring them a surer-footed reading of applicable law.” (at 726)

“State courts, not federal courts, should be the final arbiters of state law in our federal system.” (Discussion and Analysis)

FACTUAL BACKGROUND

The parties litigated federal and state-law claims and counterclaims in federal court for approximately two years. Discovery was completed, but the case had not reached trial, and the court had not expended substantial resources deciding the remaining state-law claims. The remaining claims included an Alabama invasion-of-privacy claim involving whether accessing an already-opened email could constitute wrongful intrusion, an issue the court viewed as potentially novel under Alabama law.

PROCEDURAL HISTORY

Plaintiff filed the action in federal district court on March 25, 2024. Defendant answered and later filed an amended answer and counterclaims. Following discovery, both parties moved for summary judgment. On May 4, 2026, the court granted Defendant's motion in part and dismissed all federal claims, then ordered briefing on supplemental jurisdiction. After receiving the parties' briefs, the court declined supplemental jurisdiction and dismissed the remaining state-law claims and counterclaims without prejudice.

DISPOSITION

dismissed

CASES CITED

- *Ameritox, Ltd. v. Millennium Labs., Inc.*, 803 F.3d 518, 532 (11th Cir. 2015)

- City of Chicago v. International College of Surgeons, 522 U.S. 156, 173 (1997)
- United Mine Workers v. Gibbs, 383 U.S. 715, 726 (1966)
- Carnegie-Mellon University v. Cohill, 484 U.S. 343 (1988)

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