

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
TENNESSEE, NASHVILLE DIVISION

Matthew Rigney, et al. v. CSX Transporttation, Inc.

Rigney · No. 3:22-cv-00342 · Decided April 14, 2026

SUMMARY

The United States District Court for the Middle District of Tennessee overruled CSX Transportation’s objections to a magistrate judge’s Report and Recommendation. The court held that Local Civil Rule 7.01 required CSX to confer with opposing counsel before filing its sanctions-related motion under Federal Rules of Civil Procedure 37 and 41(b). The court adopted the Report and Recommendation and denied CSX’s motion to dismiss.

CASE DETAILS

COURT	United States District Court for the Middle District of Tennessee, Nashville Division
JURISDICTION	United States District Court for the Middle District of Tennessee, Nashville Division
DECIDED	April 14, 2026
DOCKET	3:22-cv-00342
DISPOSITION	other
PROCEDURAL POSTURE	The district court reviewed de novo a magistrate judge's report and recommendation recommending denial of CSX's motion to dismiss under Federal Rules of Civil Procedure 37(c) and 41(b), after CSX filed objections.
STANDARD OF REVIEW	De novo review of portions of the report and recommendation to which specific objections were made under 28 U.S.C. § 636(b)(1)(C) and Federal Rule of Civil Procedure 72(b)(3).
PRECEDENTIAL VALUE	Unknown; district court order with no reported citation.
PARTIES	CSX Transportation, Inc. v. Matthew Rigney, et al.

TOPICS

sanctions

motions to dismiss

civil procedure

commercial litigation

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the district court should adopt the magistrate judge's recommendation to deny CSX's motion under Rules 37(c) and 41(b).
2. Whether Middle District of Tennessee Local Civil Rule 7.01(a)(1) required CSX to confer with opposing counsel before filing its sanctions motion.
3. Whether the district court should entertain the sanctions motion despite CSX's failure to comply with the meet-and-confer requirement.

HOLDINGS

1. Local Civil Rule 7.01(a)(1) requires the moving party to confer with opposing counsel before filing a motion unless the motion falls within one of the rule's specified exceptions; motions for sanctions under Rules 37 and 41(b) are not excepted.
2. The court would not entertain CSX's motion because CSX failed to comply with the required meet-and-confer process.

KEY QUOTATIONS

"The purpose is to narrow the scope of the issues, clarify contested facts, and attempt resolution of the underlying dispute before burdening the Court with substantial motion practice." (at 2)

"The Court declines to entertain this motion when the parties cannot be bothered to meet and attempt to resolve their issues or, at the very least, limit their scope." (at 3)

FACTUAL BACKGROUND

CSX sought sanctions-related relief under Federal Rules of Civil Procedure 37(c) and 41(b), apparently based on alleged misconduct concerning a production and video exhibits. CSX filed the motion without first conferring with opposing counsel. The court determined that a conference would have helped narrow factual disputes and potentially resolve or limit the motion practice.

PROCEDURAL HISTORY

The magistrate judge recommended denying CSX's motion based in part on CSX's failure to confer with opposing counsel before filing it. CSX objected on five grounds, including the asserted lack of any meet-and-confer requirement and the magistrate judge's handling of the evidence. The district court conducted de novo review, overruled the objections, adopted and approved the report and recommendation, and denied the motion.

DISPOSITION

other

CASES CITED

- Allergan, Inc. v. Revance Therapeutics, Inc., No. 3:23-CV-00431, 2025 WL 1487280, at *2 (M.D. Tenn. Mar. 31, 2025)
- HBKY, LLC v. Elk River Exp., LLC, 150 F.4th 480, 488 (6th Cir. 2025)

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