

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Casillas v. Lowe's Home Centers, LLC

Casillas · No. 1:25-cv-00653-JLT-CDB · Decided August 21, 2025

SUMMARY

The United States District Court for the Eastern District of California addresses the parties’ joint stipulation to voluntarily dismiss a putative class action. The court concludes that Rule 23(e) does not require approval or notice because no class had been certified or proposed for settlement. The Clerk was directed to close the case, with the plaintiff’s individual claims dismissed with prejudice and the putative class claims dismissed without prejudice.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	United States Magistrate Judge
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	August 21, 2025
DOCKET	1:25-cv-00653-JLT-CDB
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff filed a putative class action in state court. Defendant removed the action to federal court, and the parties jointly stipulated to voluntary dismissal under Federal Rule of Civil Procedure 41(a)(1)(A) (ii).
PRECEDENTIAL VALUE	unpublished

TOPICS

- class actions
- civil procedure

PRACTICE AREAS

- civil procedure
- class actions

QUESTIONS PRESENTED

1. Whether court approval under Federal Rule of Civil Procedure 23(e) was required for the parties' stipulated dismissal of a putative class action when no class had been certified and no class had been proposed for certification for purposes of settlement.
2. Whether the clerk should close the case pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii).

HOLDINGS

1. Rule 23(e) does not require court approval of, or notice concerning, a stipulated dismissal when no class has been certified and no class has been proposed for certification for purposes of settlement, provided the dismissal does not affect putative class members' possible claims.
2. The parties' signed stipulation satisfied Federal Rule of Civil Procedure 41(a)(1)(A)(ii), so the action was terminated by operation of law and the clerk was directed to close the case.

KEY QUOTATIONS

“In a class action, however, court approval of dismissal may be required under Rule 41(a)(2) if the class has been certified.” (1)

“This action shall be terminated by operation of law without further order of the Court.” (2)

FACTUAL BACKGROUND

Jesse Casillas filed a putative class action against Lowe's Home Centers, LLC in state court, and Lowe's removed the action to federal court. No class had been certified, and no class had been proposed for certification for purposes of settlement. The parties jointly stipulated to dismissal with prejudice of Casillas's individual claims and without prejudice of the putative class claims.

PROCEDURAL HISTORY

Plaintiff initiated a putative class action in state court on April 21, 2025. Defendant removed the action to the Eastern District of California on May 30, 2025. On August 20, 2025, all appearing parties filed a joint stipulation seeking dismissal, with prejudice as to Plaintiff's individual claims and without prejudice as to the putative class claims. The court directed the clerk to close the case without requiring court approval or notice to putative class members.

DISPOSITION

dismissed

CASES CITED

- Titus v. BlueChip Financial, 786 Fed. Appx. 694, 695 (9th Cir. 2019)
- Employers-Teamsters Local Nos. 175 & 505 Pension Trust Fund v. Anchor Capital Advisors, 498 F.3d 920, 924 (9th Cir. 2007)
- Commercial Space Management Co., Inc. v. Boeing Co., Inc., 193 F.3d 1074, 1077-78 (9th Cir. 1999)

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