

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PRECEDENTIAL VALUE	unpublished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)

OPINION

Casillas v. Lowe's Home Centers, LLC

PER CURIAM.

1 2 3 4 5 6 7

8 UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA

10 11 JESSE CASILLAS, Case No. 1:25-cv-00653-JLT-CDB 12 Plaintiff, ORDER DIRECTING
CLERK OF THE

13 v. COURT TO CLOSE CASE PURSUANT

TO RULE 41(a)(1) OF THE FEDERAL

14 LOWE'S HOME CENTERS, LLC, RULES OF CIVIL PROCEDURE

15 Defendant. (Doc. 6) 16 17 18 On April 21, 2025, Plaintiff Jesse Casillas ("Plaintiff") initiated
this action with the filing 19 of a putative class action complaint in state court against Defendant
Lowe's Home Centers, LLC 20 ("Defendant"). (Doc. 1-1). Defendant removed the action to this
Court on May 30, 2025. (Doc. 21 1). 22 Pending before the Court is the parties' joint stipulation
for voluntary dismissal of the 23 action, filed on August 20, 2025. (Doc. 6). The stipulation is
signed by all appearing parties and 24 otherwise comports with the requirements of Fed. R. Civ. P.
41(a)(1)(A)(ii) and Plaintiff is entitled 25 to dismiss his individual claims (at least) without a court
order. In a class action, however, court 26 approval of dismissal may be required under Rule 41(a)
(2) if the class has been certified. 27 Specifically, Rule 23(e) provides that any claims arising out
of either a (1) "certified class" or (2) 28 "class proposed to be certified for purposes of settlement
... may be settled, voluntarily dismissed, 1 | compromised only with the court's approval." Fed. R.
Civ. P. 23(e) (emphasis added). 2 In this case, Plaintiff seeks to dismiss his individual claims with
prejudice and the claims of 3 | the putative class without prejudice. (Doc. 6 at 2). No class has
been certified in this action nor is 4 | there a class proposed to be certified for purposes of
settlement. (See Doc. 1). Because no class 5 | has been certified in this case, and because any
dismissal would not affect putative class members' 6 | possible claims, Rule 23(e) does not
mandate either Court approval of the parties' stipulation to 7 | dismiss the action or notice to
putative class members. See *Titus v. BlueChip Financial*, 786 Fed. 8 | Appx. 694, 695 (9th Cir.
2019) ("Because no class has been certified, Titus is the only plaintiff 9 | before the court; once she
has dismissed her claims with prejudice, no other plaintiff can step into 10 | her shoes to continue
this legal action") (unpublished) (citing *Emp 'rs-Teamsters Local Nos. 175 & 11 | 505 Pension Tr.*
Fund v. Anchor Capital Advisors, 498 F.3d 920, 924 (9th Cir. 2007)). 12 In light of Plaintiff's
filing, the Court finds that Rule 23(e) does not require the Court's 13 || approval of the dismissal.
This action shall be terminated by operation of law without further order 14 | of the Court. *Comm.*
Space Mgmt. Co., Inc. v. Boeing Co., Inc., 193 F.3d 1074, 1077-78 (9th Cir. 15 1999). 16
Accordingly, the Clerk of the Court is DIRECTED to CLOSE this case and adjust the docket 17 |
to reflect dismissal with prejudice as to Plaintiff's individual claims and dismissal without prejudice

18 | as to the claims of the putative class pursuant to Fed. R. Civ. P. 41(a)(1)(A)Gw), with each
party to 19 | bear that party's own attorney's fees and costs. 20 | IT IS SOORDERED. *I | Dated: _
August 21, 2025 | Word bo
22 UNITED STATES MAGISTRATE JUDGE
23 24 25 26 27 28