

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF KANSAS

Steven Crump v. Johnson County Board of Commissioners, et al.

Crump · No. 24-3046-JAR-RES · Decided December 4, 2025

SUMMARY

The United States District Court for the District of Kansas denies Steven Crump’s motions for sanctions and denies as moot his motion to compel against Summit Food Service, LLC. The Court holds that Rule 16(f) provides authority to sanction Summit for missing a pretrial deadline but concludes that sanctions and expenses are unwarranted because the delay was inadvertent, caused little or no prejudice, and Summit ultimately complied.

CASE DETAILS

COURT	United States District Court for the District of Kansas
WRITING FOR THE COURT	Julie A. Robinson
JURISDICTION	United States District Court for the District of Kansas
DECIDED	December 4, 2025
DOCKET	24-3046-JAR-RES
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for sanctions under Federal Rules of Civil Procedure 16(f) and 37(b), the Court's inherent authority, and moved to compel Defendant Summit Food Service, LLC, to comply with a prior service-related order. The court denied the sanctions motions and denied the motion to compel as moot.
STANDARD OF REVIEW	Sanctions under Federal Rule of Civil Procedure 16(f) are committed to the court's discretion. The court also assessed whether the prerequisites for sanctions under Rule 37(b) and the court's inherent authority were satisfied.
PRECEDENTIAL VALUE	Unpublished district court memorandum and order; precedential status unknown
PARTIES	Steven Crump v. Johnson County Board of Commissioners, et al., Summit Food Service, LLC

TOPICS

sanctions

civil procedure

service of process

PRACTICE AREAS

civil procedure

sanctions

discovery and pretrial practice

QUESTIONS PRESENTED

1. Whether the Court had authority to impose sanctions under Federal Rule of Civil Procedure 37(b) for Summit's failure to comply with the prior service-related order.
2. Whether the Court should exercise its inherent authority to sanction Summit for its untimely filing.
3. Whether Summit's failure to meet the deadline in the August 28 order constituted a violation of a pretrial order subject to sanctions under Federal Rule of Civil Procedure 16(f).
4. Whether sanctions or reasonable expenses were warranted under Rule 16(f) given the inadvertent delay, subsequent compliance, lack of prejudice, and lack of expenses.

HOLDINGS

1. Rule 37(b) did not authorize sanctions because Summit's violation involved a service-related order, not a discovery order issued under Rules 26(f), 35, or 37(a).
2. The Court declined to impose sanctions under its inherent authority because the record did not show that Summit acted in bad faith, vexatiously, wantonly, or for oppressive reasons.
3. The Court had authority under Rule 16(f) because Summit failed to obey a pretrial order, but sanctions and expenses were not warranted under the circumstances.

KEY QUOTATIONS

“To exercise its inherent authority, the Court must find that “a party has acted in bad faith, vexatiously, wantonly, or for oppressive reasons.””

FACTUAL BACKGROUND

The Court's August 28, 2025 order directed Summit to file under seal by September 12 the last known address of Robb Nathaniel and, if identifiable, the name and address of an unnamed Summit dietitian for service purposes. Summit missed the deadline and later filed the required information under seal on October 2, identifying Dana Kurtz and agreeing to accept service for her. Summit attributed the delay to an inadvertent effort to search its records thoroughly, and Plaintiff did not allege prejudice or expenses caused by the delay.

PROCEDURAL HISTORY

The Court ordered Summit to file under seal information needed to serve Defendant Robb Nathaniel and identify and serve an unnamed Summit dietitian. Summit missed the September 12, 2025 deadline but filed the required information on October 2, 2025, identifying the dietitian as Dana Kurtz and accepting service on her behalf. Plaintiff then sought sanctions, requested that Summit's filing be stricken, requested \$50,000 in monetary sanctions, and sought an order compelling compliance.

DISPOSITION

other

CASES CITED

- Chambers v. NASCO, Inc., 501 U.S. 32, 33 (1991)
- In re Baker, 744 F.2d 1438, 1440–42 (10th Cir. 1984)

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