

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF  
MICHIGAN, SOUTHERN DIVISION

Hamood v. Arab Community Center for Economic and Social  
Services d/b/a ACCESS

Hamood · No. 23-cv-10270 · Decided February 6, 2026

SUMMARY

The court denied Plaintiff Sudoos Hamood’s supplemental motion in limine in her religious-accommodation action against ACCESS. The court held that Defendant could challenge the factual assumptions underlying Plaintiff’s rejection of a proposed accommodation, including the likelihood that men would see her uncovered face during a virtual class, while noting that the ruling was preliminary and subject to reconsideration during trial.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                        |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Eastern District of Michigan, Southern Division                                                                                                                                                                                                                                                   |
| WRITING FOR THE COURT | Linda V. Parker                                                                                                                                                                                                                                                                                                                        |
| JURISDICTION          | United States District Court for the Eastern District of Michigan, Southern Division                                                                                                                                                                                                                                                   |
| DECIDED               | February 6, 2026                                                                                                                                                                                                                                                                                                                       |
| DOCKET                | 23-cv-10270                                                                                                                                                                                                                                                                                                                            |
| DISPOSITION           | other                                                                                                                                                                                                                                                                                                                                  |
| PROCEDURAL POSTURE    | Plaintiff filed a supplemental motion in limine seeking to preclude Defendant from introducing arguments or evidence characterizing as unreasonable, far-fetched, or unlikely Plaintiff's concern that men might see her uncovered face during virtual instruction. The district court denied the motion.                              |
| STANDARD OF REVIEW    | District courts have broad discretion over the admissibility of evidence and may alter a preliminary in limine ruling during trial. Relevance is assessed under Federal Rules of Evidence 401 and 402, and relevant evidence may be excluded under Rule 403 when its probative value is substantially outweighed by specified dangers. |
| PRECEDENTIAL VALUE    | unpublished district court order; limited persuasive value                                                                                                                                                                                                                                                                             |

## TOPICS

religious discrimination

employment discrimination

motion in limine

evidence

civil procedure

## PRACTICE AREAS

employment law

civil rights

evidence

civil procedure

## QUESTIONS PRESENTED

1. Whether the court should preclude Defendant from presenting evidence or argument that Plaintiff's concern about men seeing her uncovered face during virtual instruction was unreasonable, far-fetched, or unlikely.
2. Whether Title VII bars an employer from challenging the factual assumptions underlying an employee's rejection of a proposed religious accommodation when the employer does not challenge the sincerity of the employee's religious belief.

## HOLDINGS

1. Title VII does not bar an employer from examining the factual assumptions underlying an employee's rejection of a religious accommodation request. Defendant may present evidence that the risk Plaintiff fears is unlikely to support an argument that its proposed accommodation was reasonable.
2. The court denied Plaintiff's supplemental motion in limine because the challenged arguments and evidence were not categorically inadmissible and could be relevant to whether Defendant's proposed accommodation was reasonable.

## KEY QUOTATIONS

*"Title VII does not bar an employer from examining the factual assumptions underlying a rejection of an accommodation request."* (Section III)

*"Accordingly, The Court DENIES Plaintiff's supplemental motion in limine."* (Section IV)

## FACTUAL BACKGROUND

Sudoos Hamood, a practicing niqabi and ESL instructor, taught an all-female class for ACCESS. When ACCESS moved classes online during the COVID-19 pandemic and required instructors to appear on camera, Hamood asserted that showing her uncovered face conflicted with her religious practice. ACCESS proposed a no-screenshot policy as an accommodation, but Hamood rejected it because she did not trust students to comply and feared that male family members in students' homes might see her uncovered face. During a settlement conference, ACCESS's counsel characterized that risk as unlikely or far-fetched.

## PROCEDURAL HISTORY

Plaintiff brought a Title VII religious-accommodation case arising from her termination by ACCESS. After a settlement conference, Plaintiff sought leave to file a supplemental motion in limine concerning statements made by Defendant's counsel during the conference; the court granted leave, Plaintiff filed the motion, and Defendant

responded. The court denied the motion, while noting that the ruling was preliminary and could be reconsidered during trial.

## DISPOSITION

other

## CASES CITED

- United States v. Seago, 930 F.2d 482, 494 (6th Cir. 1991)
- Luce v. United States, 469 U.S. 38, 41 n.4 (1984)
- United States v. Yannott, 42 F.3d 999, 1007 (6th Cir. 1994)
- Robinson v. Runyon, 149 F.3d 507, 512 (6th Cir. 1998)
- Douglass v. Eaton Corp., 956 F.2d 1339, 1344 (6th Cir. 1992)
- Robinson v. Runyon, 149 F.3d 507, 514-15 (6th Cir. 1998)
- Koloda v. General Motors Parts Division, General Motors Corp., 716 F.2d 373, 378 (6th Cir. 1983)

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