

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PRECEDENTIAL VALUE	unpublished district court order; limited persuasive value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)

OPINION

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION SUDOOS HAMOOD, Plaintiff, v. Case No. 23-cv-10270 Honorable Linda V. Parker ARAB COMMUNITY CENTER FOR ECONOMIC AND SOCIAL SERVICES d/b/a ACCESS, a Domestic Nonprofit Corporation, Defendant. _____/ ORDER DENYING PLAINTIFF’S SUPPLEMENTAL MOTION IN LIMINE This is a religious accommodation case arising from Plaintiff Sudoos Hamood’s termination by Defendant Arab Community Center for Economic and Social Services (“ACCESS”).

On November 11, 2025, Plaintiff moved for leave to file a supplemental motion in limine to address statements made by Defendant during the Parties’ October 2, 2025, settlement conference. (ECF No. 65.) The Court granted leave during a brief status conference held on the morning of January 20, 2026, and Plaintiff filed the motion later that day. (ECF No. 68.)

Defendant filed its response on January 26, 2026. (ECF No. 70.) I. Background Plaintiff is a practicing niqabi who worked as an ESL instructor for Defendant. She taught an all-female class. When Defendant moved its classes online during the COVID-19 pandemic, it required all instructors to activate their cameras and appear with their faces on-screen.

Because Plaintiff’s religious practice requires her to cover her face, Plaintiff asserts that the policy created a conflict with her beliefs. Defendant contends that it offered Plaintiff a reasonable accommodation by suggesting that Plaintiff establish a policy where students agreed to not take screenshots or photos during class. (ECF No. 34-9 at PageID.839.)

Plaintiff rejected the proposed accommodation because she did not trust that all students would comply and she was uncomfortable with the idea. *Id.* On October 2, 2025, the Parties appeared before the Court for a settlement conference. During the conference, Plaintiff again expressed her reasons for rejecting Defendant's proposed no-screenshot policy. She also stated that the policy did not address her concern that male family members present in her students' homes could see her uncovered face if she taught virtually without her niqab.

Defendant's counsel responded that it was unlikely or "far-fetched" that any male would see Plaintiff's face while she taught her all-female class. The exchange was made in the presence of the Court. Plaintiff filed the present motion in limine to address those comments. Plaintiff moves to preclude Defendant from introducing any argument, evidence, or commentary that characterizes her concern about being seen by men as "unreasonable," "far-fetched," or "unlikely." (ECF No. 68 at PageID.2965-66.)

Plaintiff argues that such argument is prejudicial and misstates the applicable legal standard under Title VII because it invites the jury to evaluate the plausibility of the basis of her religious accommodation request, rather than the sincerity of her belief. (*Id.* at 2966-68.) She further argues that such argument has no relevance under Title VII, would confuse the jury, and constitutes an impermissible burden-shifting tactic.

Id. II. Standard of Review District courts have broad discretion over matters involving the admissibility of evidence at trial. See *United States v. Seago*, 930 F.2d 482, 494 (6th Cir. 1991). "Although the Federal Rules of Evidence do not explicitly authorize in limine rulings, the practice has developed pursuant to the district court's inherent authority to manage the course of trials." *Luce v. United States*, 469 U.S. 38, 41 n.4 (1984). "A ruling on a motion in limine is no more than a preliminary, or advisory, opinion that falls entirely within the discretion of the district court." *United States v. Yannott*, 42 F.3d 999, 1007 (6th Cir.

1994). A court may therefore alter its ruling during trial. See *Luce*, 469 U.S. at 41-42. The Federal Rules of Evidence preclude the admissibility of "[i]rrelevant evidence[.]" Fed. R. Evid. 402. "The rules regarding relevancy, however, are quite liberal." *Robinson v. Runyon*, 149 F.3d 507, 512 (6th Cir. 1998).

Under the Federal Rules of Evidence, "[e]vidence is relevant... if it has any tendency to make a fact more or less probable than it would be without the evidence; and... the fact is of consequence in determining the action." Fed. R. Evid. 401 (emphasis added).

The Court is not "permitted to consider the weight or sufficiency of the evidence in determining relevancy and 'even if [it] believes the evidence is insufficient to prove the ultimate point for which it is offered, it may not exclude the evidence if it has even the slightest probative worth.'" *Robinson*, 149 F.3d at 512 (quoting *Douglass v. Eaton Corp.*, 956 F.2d 1339, 1344 (6th Cir.

1992)). Relevant evidence may be excluded, however, “if its probative value is substantially outweighed by a danger of unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence.” Fed. R. Evid. 403. Evidence is inadmissible if there is a danger of unfair prejudice, not mere prejudice.

See Robinson, 149 F.3d at 514-15 (citing Fed. R. Evid. 403). “Virtually all evidence is prejudicial or it isn’t material.” Id. at 515 (quoting *Koloda v. Gen. Motors Parts Div., Gen. Motors Corp.*, 716 F.2d 373, 378 (6th Cir. 1983)) (additional citation omitted). III. Analysis Plaintiff asks the Court to preclude Defendant from introducing argument, evidence, or commentary suggesting that Plaintiff’s basis for requesting a religious accommodation—specifically, her concern that she may be seen by men outside of her family—is unreasonable, far-fetched, unlikely, or otherwise lacking in credibility based on its perceived rationality or plausibility.

(ECF No. 68 at PageID.2965.) Plaintiff frames this as an attack on the sincerity of her religious belief. However, Defendant is not challenging the sincerity of Plaintiff’s religious belief that she must cover her face in the presence of men.¹ (See ECF No. 70 at PageID.3005.) Instead, Defendant challenges a different proposition: whether, as a factual matter, it is likely that a man would view Plaintiff’s uncovered face by looking onto a student’s computer screen from the background while Plaintiff taught her all-woman virtual class.

Plaintiff treats these two positions as if they are the same. They are not. The Court finds that Plaintiff uses the term “belief” too broadly. In its Motion, Plaintiff blends the ‘belief’ language used in Title VII with general assumptions or beliefs that are tangentially related to Plaintiff’s religious practice. ¹ In its response, Defendant states that it has “no intention... of offering evidence or making arguments that the Plaintiff’s professed religious beliefs or practices are “unreasonable or “far- fetched.” (ECF No. 70 at PageID.3005.)

Defendant’s comments concern a separate, factual assumption and whether the proposed no-screenshot policy would have reasonably accommodated her religious practice. Plaintiff’s objection to the no-screenshot policy partially rested on assumptions about the security of the virtual classroom and the level of privacy within each students’ home. Defendant may challenge those assumptions.

Title VII does not bar an employer from examining the factual assumptions underlying a rejection of an accommodation request. Defendant may present evidence that the risk Plaintiff fears is unlikely in order to support an argument that its proposed accommodation was reasonable. IV. Conclusion Accordingly, The Court DENIES Plaintiff’s supplemental motion in limine.

(ECF No. 68.) As indicated above, this ruling is preliminary. Counsel may ask the Court at a sidebar or outside the jury’s presence to reconsider the matter if trial testimony or a line of

questioning supports its exclusion. SO ORDERED. s/ Linda V. Parker LINDA V. PARKER U.S.
DISTRICT JUDGE Dated: February 6, 2026

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