

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

Aaron Jozsa v. General Motors Company

Jozsa · No. 5:25-cv-11350 · Decided March 4, 2026

SUMMARY

The United States District Court for the Eastern District of Michigan adopts a magistrate judge’s Report and Recommendation and grants General Motors Company’s motion to dismiss. The court concludes that the plaintiff’s FMLA claim is untimely and that his Title VII and ADA claims were filed without exhaustion of administrative remedies. The case is dismissed.

CASE DETAILS

COURT	United States District Court for the Eastern District of Michigan, Southern Division
WRITING FOR THE COURT	Judith E. Levy
JURISDICTION	United States District Court for the Eastern District of Michigan, Southern Division
DECIDED	March 4, 2026
DOCKET	5:25-cv-11350
DISPOSITION	dismissed
PROCEDURAL POSTURE	The district court reviewed a magistrate judge's report and recommendation on Defendant's motion to dismiss after Plaintiff filed an objection.
STANDARD OF REVIEW	The district judge reviews proper objections to a magistrate judge's report and recommendation on dispositive motions de novo under 28 U.S.C. § 636(b)(1)(B)-(C) and Federal Rule of Civil Procedure 72(b) (1)-(3). Objections must be clear and specific enough to permit review on the merits.
PRECEDENTIAL VALUE	Unpublished district court order; limited persuasive value
PARTIES	Aaron Jozsa v. General Motors Company

TOPICS

- motions to dismiss
- civil procedure
- family and medical leave act
- title vii
- ada / disability

PRACTICE AREAS

civil procedure

employment law

family and medical leave

employment discrimination

disability discrimination

QUESTIONS PRESENTED

1. Whether Plaintiff's objection sufficiently challenged the recommendation to dismiss his FMLA claim as untimely.
2. Whether the submitted documents plausibly demonstrated a willful violation of the FMLA sufficient to invoke the three-year limitations period.
3. Whether Plaintiff's Title VII and ADA claims were subject to dismissal because he failed to exhaust administrative remedies.

HOLDINGS

1. Plaintiff's FMLA claim was untimely because he did not plausibly plead a willful violation that would extend the limitations period from two years to three years.
2. Plaintiff's Title VII and ADA claims were properly dismissed because the face of the complaint showed that he had not exhausted administrative remedies before filing suit.
3. The objection was overruled because it did not clearly identify the portions of the report and recommendation being challenged or provide a sufficient basis for objection.

KEY QUOTATIONS

“But even if Plaintiff had initially included these documents with his complaint, Plaintiff does not demonstrate a willful violation of the FMLA.” (Opinion at Section III.A)

“As such, “it is clear from the face of the complaint that Jozsa did not exhaust his administrative remedies before bringing his Title VII and ADA claims.”” (Opinion at Section III.B)

FACTUAL BACKGROUND

Plaintiff alleged that General Motors fired him while he was on an approved medical leave of absence beginning March 28, 2022. He submitted documents concerning Sickness and Accident benefits, communications about returning to work, and a possible request for personnel records. Plaintiff also asserted claims under the Family and Medical Leave Act, Title VII, and the Americans with Disabilities Act, but admitted that he had not filed an EEOC charge and had not received a right-to-sue notice.

PROCEDURAL HISTORY

Magistrate Judge Kimberly G. Altman recommended dismissal of Plaintiff's claims. Plaintiff objected and submitted additional documents, and Defendant responded. The district court overruled the objection, adopted the report and recommendation, granted General Motors Company's motion to dismiss, and dismissed the case.

DISPOSITION

dismissed

CASES CITED

- Pearce v. Chrysler Group LLC Pension Plan, 893 F.3d 339, 346 (6th Cir. 2018)
- Coleman-Bey v. Bouchard, 287 F. App'x 420, 422 (6th Cir. 2008)
- Brumley v. Wingard, 269 F.3d 629, 647 (6th Cir. 2001)
- Miller v. Currie, 50 F.3d 373, 380 (6th Cir. 1995)
- Howard v. Secretary of Health and Human Services, 932 F.2d 505, 509 (6th Cir. 1991)
- Thomas v. Arn, 474 U.S. 140, 147 (1985)
- Boswell v. Mayer, 169 F.3d 384, 387 (6th Cir. 1999)
- Crugher v. Prelesnik, 761 F.3d 610, 617 (6th Cir. 2014)
- Hoffman v. Professional Medical Team, 394 F.3d 414, 417 (6th Cir. 2005)
- Katoula v. Detroit Entertainment, LLC, 557 F. App'x 496, 498 (6th Cir. 2014)
- Seeger v. Cincinnati Bell Telephone Co., LLC, 681 F.3d 274 (6th Cir. 2012)
- Moorer v. Baptist Memorial Health Care System, 398 F.3d 469 (6th Cir. 2005)
- Burlington Northern & Santa Fe Railway Co. v. White, 548 U.S. 53 (2006)