

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
OHIO, WESTERN DIVISION AT DAYTON

James M. Chambers v. David Nickerson et al.

Chambers · No. 3:25-cv-338 · Decided January 14, 2026

SUMMARY

The United States District Court for the Southern District of Ohio denied James M. Chambers’s motion to remand his employment-related action to Ohio state court. The court held that the FMLA claim supported federal-question jurisdiction and that the state-law claims arose from the same nucleus of operative facts, making supplemental jurisdiction appropriate. The court further concluded that the state-law claims did not substantially predominate and that other discretionary factors did not justify remand.

CASE DETAILS

COURT	United States District Court for the Southern District of Ohio, Western Division at Dayton
WRITING FOR THE COURT	Thomas M. Rose
JURISDICTION	United States District Court for the Southern District of Ohio, Western Division at Dayton
DECIDED	January 14, 2026
DOCKET	3:25-cv-338
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved to remand an action removed from Ohio state court, arguing that his state-law claims substantially predominated over his federal Family and Medical Leave Act claim and that discretionary remand was appropriate.
STANDARD OF REVIEW	The court applied the statutory standards governing federal-question jurisdiction, supplemental jurisdiction, removal, and discretionary remand under 28 U.S.C. §§ 1331, 1367, 1441, and 1446. The removing party bears the burden of establishing federal jurisdiction.
PRECEDENTIAL VALUE	unpublished district court opinion

TOPICS

- subject matter jurisdiction
- civil procedure
- family and medical leave act
- employment law

PRACTICE AREAS

Civil procedure

Federal jurisdiction

Employment law

Family and Medical Leave Act

QUESTIONS PRESENTED

1. Whether the federal FMLA claim and the eight state-law claims shared a common nucleus of operative fact sufficient to support supplemental jurisdiction under 28 U.S.C. § 1367(a).
2. Whether the state-law claims substantially predominated over the federal FMLA claim so that discretionary remand was warranted under 28 U.S.C. § 1367(c)(2).
3. Whether the early stage of the litigation, judicial economy, and convenience of the parties justified discretionary remand.

HOLDINGS

1. The court held that it had supplemental jurisdiction over all eight state-law claims because they shared a common nucleus of operative fact with the FMLA claim.
2. The court held that the state-law claims did not substantially predominate over the FMLA claim, despite outnumbering it, because the claims were factually and legally intertwined and sought the same remedies.
3. The court held that the early stage of the case and the parties' convenience did not justify discretionary remand.

KEY QUOTATIONS

“Here, Plaintiff’s federal and state law claims undoubtedly emanate from a common nucleus of operative fact.” (Section III.A)

“Here, although Plaintiff’s federal claim is irrefutably outnumbered, Plaintiff’s state claims do not substantially predominate over his FMLA claim.” (Section III.B)

“Accordingly, the Court DENIES Plaintiff’s Motion to Remand (Doc. No. 4).” (Conclusion)

FACTUAL BACKGROUND

Plaintiff was employed by the Municipality of New Lebanon and worked for its police department, eventually becoming Acting Police Chief. After workplace disputes and allegedly retaliatory conduct, Plaintiff took sick leave, submitted an application under the FMLA, and was terminated. His complaint asserted one FMLA claim and eight related common-law and Ohio-law claims arising from the termination and surrounding events.

PROCEDURAL HISTORY

Plaintiff filed the action in the Montgomery County, Ohio, Court of Common Pleas on September 12, 2025. Defendants removed the action to federal court on October 9, 2025, invoking federal-question jurisdiction over the FMLA claim and supplemental jurisdiction over the state-law claims. Plaintiff moved to remand; the district court denied the motion.

DISPOSITION

other

REMAND INSTRUCTIONS

None. The Motion to Remand was denied, and the case remained in federal court.

CASES CITED

- Kokkonen v. Guardian Life Insurance Co. of America, 511 U.S. 375, 377 (1994)
- Home Depot U.S.A., Inc. v. Jackson, 587 U.S. 435, 437 (2019)
- Insurance Corp. of Ireland v. Compagnie des Bauxites de Guinee, 456 U.S. 694, 701 (1982)
- Peters v. Cars To Go, Inc., 184 F.R.D. 270, 274 (W.D. Mich. 1998)
- Miller v. Bruenger, 949 F.3d 986, 990 (6th Cir. 2020)
- Eastman v. Marine Mechanical Corp., 438 F.3d 544, 549 (6th Cir. 2006)
- Royal Canin U.S.A., Inc. v. Wullschleger, 604 U.S. 22, 27 (2025)
- United Mine Workers of America v. Gibbs, 383 U.S. 715, 725 (1966)
- Smith v. Meijer of Ohio, Inc., 566 F. Supp. 113 (S.D. Ohio 1983)
- Carmicle v. BJI Holdings, LLC, No. 14-CV-00286, 2014 WL 2781158 (W.D. Ky. June 19, 2014)
- Harris v. NewRez, LLC, No. 19-CV-02211, 2019 WL 3254800, at *5 (W.D. Tenn. July 19, 2019)
- Filing v. Phipps, No. 07-CV-1712, 2008 WL 11380153, at *7-*8 (N.D. Ohio Oct. 17, 2008)
- Parker v. Scrap Metal Processors, Inc., 468 F.3d 733, 744 (11th Cir. 2006)
- Detroit Edison Co. v. Michigan Department of Environmental Quality, 29 F. Supp. 2d 786, 793 (E.D. Mich. 1998)
- Williamson v. Recovery Ltd. Partnership, No. 2-06-292, 2009 WL 649841, at *9 (S.D. Ohio Mar. 11, 2009)
- Overley v. Covenant Transport, Inc., 178 F. App'x 488, 494 (6th Cir. 2006)
- Lanzer v. Louisville, 2016-Ohio-8071, 75 N.E.3d 752, ¶ 44 (Ohio Ct. App. 2016)
- Landefeld v. Marion General Hospital, Inc., 994 F.2d 1178, 1182 (6th Cir. 1993)
- Lee v. Detroit Medical Center, No. 05-CV-70754, 2005 WL 8155096, at *2 (E.D. Mich. July 22, 2005)

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