

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
VIRGINIA, ALEXANDRIA DIVISION

John Joyce v. Federal Home Loan Mortgage Corporation

Joyce · No. 1:25-cv-97 (RDA/LRV) · Decided February 11, 2026

SUMMARY

The Eastern District of Virginia granted Federal Home Loan Mortgage Corporation’s motion to dismiss John Joyce’s Title VII retaliation claim. The court held that Joyce had not plausibly alleged protected activity because his emails and complaints did not adequately oppose an unlawful employment practice based on race or national origin, and alternatively found that his June 5 email was insubordinate and disruptive. The complaint was dismissed without prejudice, and Joyce was given an opportunity to seek leave to amend.

CASE DETAILS

COURT	United States District Court for the Eastern District of Virginia, Alexandria Division
WRITING FOR THE COURT	Rossie D. Alston, Jr.
JURISDICTION	United States District Court for the Eastern District of Virginia, Alexandria Division
DECIDED	February 11, 2026
DOCKET	1:25-cv-97 (RDA/LRV)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendant moved to dismiss Plaintiff's single-count Title VII retaliatory-discharge complaint under Federal Rule of Civil Procedure 12(b)(6). The court granted the motion and dismissed the complaint without prejudice, allowing one opportunity to seek leave to amend.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded factual allegations as true, draws reasonable inferences in the plaintiff's favor, and determines whether the complaint states a facially plausible claim for relief. The court need not accept legal conclusions, unwarranted inferences, unreasonable conclusions, or arguments as true. Attached exhibits control over conflicting bare allegations.
PRECEDENTIAL VALUE	Unknown; memorandum opinion and order from a federal district court

PARTIES

John Joyce v. Federal Home Loan Mortgage Corporation

TOPICS

retaliation

title vii

employment discrimination

motions to dismiss

civil procedure

PRACTICE AREAS

employment law

civil rights

civil procedure

QUESTIONS PRESENTED

1. Whether Joyce plausibly alleged that any of his emails or complaints constituted protected activity under Title VII's opposition or participation provisions.
2. Whether the complaint stated a plausible Title VII retaliatory-discharge claim when the attached emails did not identify an unlawful employment practice based on race, color, religion, sex, or national origin.
3. Whether the complaint should be dismissed without prejudice when the court could not conclude that all potential amendments would be futile.

HOLDINGS

1. Joyce did not plausibly allege protected activity because his April 2 email and April 21 human-resources complaint were vague or concerned generalized compensation and unfair-treatment complaints without identifying discrimination prohibited by Title VII.
2. The May 16 email did not plausibly allege protected activity because its general reference to ending discrimination and its reference to exclusion from important teams did not connect the exclusion or any employment practice to a Title VII-protected characteristic.
3. The June 5 email did not plausibly allege protected activity because Joyce's racial insults and accusations that supervisors were racist, criminals, or thieves did not provide a good-faith basis to infer that Defendant was violating Title VII.
4. The complaint failed to state a plausible Title VII retaliation claim because it did not allege that Joyce engaged in protected activity.
5. The complaint was dismissed without prejudice, and Joyce was permitted one opportunity to file a motion for leave to amend because the court could not conclude that all potential amendments would be futile.

KEY QUOTATIONS

"To constitute protected activity, plaintiff must have complained of discrimination protected by one of the statutes under which he is bringing his claims."

"In short, Plaintiff has not plausibly alleged a protected activity with respect to any of his emails or complaints."

"The Court cannot say that all potential amendments would be futile, however."

FACTUAL BACKGROUND

John Joyce was employed by Federal Home Loan Mortgage Corporation as an Agile Development Senior and was terminated on July 18, 2024, after being suspended on June 7, 2024. He complained about compensation, alleged disparities involving predominantly South Asian and Indian coworkers, and exclusion from important team meetings. His emails included references to racial discrimination but also contained hostile, accusatory, and insubordinate statements about Indian employees and his supervisors. After receiving an EEOC right-to-sue notice, Joyce filed a Title VII retaliation action.

PROCEDURAL HISTORY

Joyce filed a Charge of Discrimination with the EEOC and received a Notice of Right to Sue on October 22, 2024. He filed this action on January 21, 2025. Defendant moved to dismiss, the parties briefed the motion, and the court granted dismissal because the complaint did not plausibly allege protected activity under Title VII.

DISPOSITION

dismissed

CASES CITED

- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 555, 556, 570 (2007)
- E.I. du Pont de Nemours & Co. v. Kolon Indus., Inc., 637 F.3d 435, 440 (4th Cir. 2011)
- Wahi v. Charleston Area Med. Ctr., Inc., 562 F.3d 599, 616 n.26 (4th Cir. 2009)
- Kloth v. Microsoft Corp., 444 F.3d 312, 319 (4th Cir. 2006)
- Goldfarb v. Mayor & City Council of Baltimore, 791 F.3d 500, 508 (4th Cir. 2015)
- Landino v. Sapp, 520 F. App'x 195, 198 (4th Cir. 2013)
- Balazs v. Liebenthal, 32 F.3d 151, 159 (4th Cir. 1994)
- Bowman v. Balt. City Bd. of School Commissioners, 173 F. Supp. 3d 242, 248 (D. Md. 2016)
- McNair v. Computer Data Sys. Inc., 172 F.3d 863 (4th Cir. Jan. 26, 1999) (unpublished table decision)
- Fayetteville Inv'rs v. Commercial Builders, Inc., 936 F.2d 1462, 1465 (4th Cir. 1991)
- Harris v. Maryland House of Corrections, 209 F. Supp. 2d 565, 570 (D. Md. 2002)
- Oguezuonu v. Genesis Health Ventures, Inc., 415 F. Supp. 2d 577, 588 (D. Md. 2005)
- Smith v. Virginia Dept. of Agric. & Consumer Servs., 2012 WL 2401749 (E.D. Va. June 25, 2012)
- Presnell v. Sharp Electronics Corp., 2022 WL 17683126, at *10 (W.D.N.C. Dec. 14, 2022)
- Bang Laugh Love, LLC v. Viragh, 2024 WL 1676841, at *2 n.3 (W.D. Va. Apr. 18, 2024)
- Conyers v. Va. Hous. Dev. Auth., 927 F. Supp. 2d 285, 295-96 (E.D. Va. 2013)
- Lewis v. Inova Health Care Servs., 2024 WL 4438474, at *8 (E.D. Va. Oct. 7, 2024)
- Dietrich v. United Parcel Serv., Inc. (Ohio), 2025 WL 445050, at *5 (5th Cir. Feb. 10, 2025)
- Ceus v. City of Tampa, 803 F. App'x 235, 247 (11th Cir. 2020)

- Gress v. Temple Univ. Health Sys., 784 F. App'x 100, 106 (3d Cir. 2019)
- Bright v. Coca Cola Refreshments USA, Inc., 2014 WL 5587349, at *20 (E.D.N.Y. Nov. 3, 2014)
- Matima v. Celli, 228 F.3d 68, 79 (2d Cir. 2000)
- Buchanan v. Hilton Garden Inn of Westbury, 2008 WL 858986, at *12 (E.D.N.Y. Mar. 31, 2008)
- Johnson v. Univ. of Cincinnati, 215 F.3d 561, 579 (6th Cir. 2000)
- Armstrong v. Index Journal Co., 647 F.2d 441, 448 (4th Cir. 1981)
- Laughlin v. Metro. Washington Airports Auth., 149 F.3d 253, 260 (4th Cir. 1998)

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