

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
ALABAMA, NORTHEASTERN DIVISION

Heath Campbell v. Skyward LLC, et al.

Campbell · No. 5:24-cv-854-HDM · Decided April 24, 2026

SUMMARY

The United States District Court for the Northern District of Alabama denied Defendants’ motion for summary judgment in Heath Campbell’s ADA discrimination action. The court held that a genuine dispute existed regarding whether Skyward LLC had the requisite number of employees under the ADA and whether Skyward and Aqua Systems Alabama LLC should be treated as an integrated enterprise or single employer. The court found evidence relating to interrelated operations, centralized labor relations, common management, and financial control sufficient to allow a reasonable jury to resolve the integrated-enterprise issue.

CASE DETAILS

COURT	United States District Court for the Northern District of Alabama, Northeastern Division
JURISDICTION	United States District Court for the Northern District of Alabama
DECIDED	April 24, 2026
DOCKET	5:24-cv-854-HDM
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved for summary judgment in an ADA employment-discrimination action. The court denied the motion as to both Skyward and Aqua Systems.
STANDARD OF REVIEW	Summary judgment is appropriate when there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The evidence must be viewed in the light most favorable to the nonmovant, and a genuine dispute exists when the evidence would permit a reasonable jury to return a verdict for the nonmoving party.
PRECEDENTIAL VALUE	unpublished
PARTIES	Heath Campbell v. Skyward LLC, Aqua Systems Alabama LLC

TOPICS

ada discrimination

disability discrimination

summary judgment

employment law

civil procedure

PRACTICE AREAS

employment law

disability discrimination

civil procedure

QUESTIONS PRESENTED

1. Whether summary judgment should be denied as to Skyward because a genuine dispute existed regarding whether Skyward employed at least 15 employees for the period required for ADA coverage.
2. Whether sufficient evidence existed for a reasonable jury to find that Skyward and Aqua Systems were an integrated enterprise or single employer under the ADA, allowing their employees to be aggregated for purposes of the ADA's employee-count requirement.

HOLDINGS

1. Skyward was not entitled to summary judgment because a genuine dispute of material fact existed regarding whether it employed the minimum number of employees required for ADA coverage.
2. Summary judgment was inappropriate for Aqua Systems because evidence concerning interrelation of operations, centralized control of labor relations, common management, and financial control could permit a reasonable jury to find that Skyward and Aqua Systems were an integrated enterprise or single employer.

KEY QUOTATIONS

“Where two ostensibly separate entities are “highly integrated with respect to ownership and operations,” a court may count them together as an integrated, single employer in determining whether they are subject to the ADA.”

“The ‘control’ required to meet the test of centralized control of labor relations is ‘actual and active control of day-to-day labor practices.’”

“The court does not reach a finding that Skyward and Aqua Systems are an integrated enterprise or single employer. But because there is some evidence of each of the four factors of the integrated enterprise or single employer test, the court finds that “the evidence is such that a reasonable jury could return a verdict for the nonmoving party” on the issue of whether the two companies are an integrated enterprise.”

FACTUAL BACKGROUND

Campbell worked as a plumber for Skyward from August 29, 2022, until Skyward terminated him on March 24, 2023; he alleged that the termination resulted from his ongoing health conditions. Skyward and Aqua Systems were separately organized companies owned by Chris Sims and Tonja Sims, respectively, but Chris Sims served as president of both and controlled or participated in financial and personnel decisions for both. The companies maintained separate offices, accounts, records, insurance, and payroll accounts, but shared certain personnel functions, financial transactions, work activities, and product-related operations. If their employees were aggregated, the companies undisputedly exceeded the ADA's employee threshold.

PROCEDURAL HISTORY

Campbell sued alleging that Skyward terminated him because of his health conditions in violation of the ADA. Defendants moved for summary judgment, arguing that Skyward lacked the minimum number of employees covered by the ADA and that Skyward and Aqua Systems were not an integrated enterprise. After oral argument, Skyward conceded that a genuine factual dispute existed regarding its employee head count. The court denied summary judgment as to Skyward and, finding sufficient evidence for a jury to determine whether the entities constituted a single employer, denied summary judgment as to Aqua Systems as well.

DISPOSITION

other

CASES CITED

- Anthony v. Georgia, 69 F.4th 796, 804 (11th Cir. 2023)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248 (1986)
- Celotex Corp. v. Catrett, 477 U.S. 317, 323-24 (1986)
- McKenzie v. Davenport-Harris Funeral Home, 834 F.2d 930, 933-34 (11th Cir. 1987)
- Fike v. Gold Kist, Inc., 514 F. Supp. 722, 726-28 (N.D. Ala. 1981), aff'd, 664 F.2d 295 (11th Cir. 1981)
- Lyes v. City of Riviera Beach, Fla., 166 F.3d 1332, 1341 & n.5 (11th Cir. 1999)
- Walker v. Boys & Girls Club of Am., 38 F. Supp. 2d 1326, 1330-33 (M.D. Ala. 1999)
- Schultz v. Metro Truck Rental Inc., No. 2:18-CV-01598-CLM, 2020 WL 7211162 (N.D. Ala. Dec. 7, 2020)