

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
WISCONSIN

Watters v. Silgan Containers LLC

Watters · No. 25-cv-984-bhl · Decided May 12, 2026

SUMMARY

The United States District Court for the Eastern District of Wisconsin granted Silgan Containers LLC's amended motion to dismiss Logan Watters's pro se complaint alleging disability discrimination, ADA retaliation, and defamation. The court found that the complaint did not adequately identify a disability, protected activity, or facts supporting defamation, but granted Watters leave to file an amended complaint by June 11, 2026.

CASE DETAILS

COURT	United States District Court for the Eastern District of Wisconsin
WRITING FOR THE COURT	Brett H. Ludwig
JURISDICTION	United States District Court for the Eastern District of Wisconsin
DECIDED	May 12, 2026
DOCKET	25-cv-984-bhl
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved to dismiss the pro se complaint under Federal Rule of Civil Procedure 12(b)(6), or alternatively for a more definite statement. The court granted the amended motion to dismiss and granted Plaintiff leave to amend.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts all well-pleaded facts as true and draws reasonable inferences in the plaintiff's favor, but the complaint must contain sufficient factual matter to state a plausible claim for relief and must do more than recite the elements of a cause of action conclusorily. Pro se complaints are construed liberally.
PRECEDENTIAL VALUE	unpublished district court order; persuasive authority only
PARTIES	Logan Watters v. Silgan Containers LLC

TOPICS

- motions to dismiss
- pleadings
- ada discrimination
- retaliation
- civil procedure

PRACTICE AREAS

civil procedure

employment law

disability discrimination

retaliation

defamation

QUESTIONS PRESENTED

1. Whether the complaint stated a claim for employment discrimination under the Americans with Disabilities Act.
2. Whether the complaint stated a claim for retaliation under the Americans with Disabilities Act.
3. Whether the complaint stated a claim for defamation under applicable state law.
4. Whether the pro se plaintiff should be allowed to amend rather than be directed to provide a more definite statement.

HOLDINGS

1. The complaint failed to state an ADA employment-discrimination claim because it did not allege facts supporting an inference that Watters was disabled within the meaning of the ADA, including facts identifying the alleged disability or showing that it substantially limited one or more major life activities. The complaint also failed to connect the attendance policy to the alleged disability.
2. The complaint failed to state an ADA retaliation claim because it did not allege that Watters engaged in statutorily protected activity.
3. The complaint failed to state a defamation claim because it merely alleged that Silgan began defaming Watters without describing the allegedly defamatory statements or conduct.
4. Rather than requiring a more definite statement, the court allowed Watters to file an amended complaint curing the identified deficiencies.

KEY QUOTATIONS

“To state a claim for employment discrimination under the ADA, Watters must allege facts to support an inference that (1) he is disabled within the meaning of the statute; (2) he is qualified to perform the essential functions of the job either with or without reasonable accommodation; and (3) he suffered an adverse employment action because of his disability.” (at 4)

“To state a claim for retaliation under the ADA, a plaintiff must allege “(1) he engaged in a statutorily protected activity; (2) he suffered an adverse action; and (3) a causal connection between the two.”” (at 5)

“Watters’s amended complaint should read like a narrative being told to someone who does not know what happened.” (at 7)

FACTUAL BACKGROUND

Logan Watters worked for Silgan Containers LLC for approximately nine years at its Menomonee Falls facility. He alleged that plant manager Aaron Mangle sought disparate discipline against him because of a known disability, implemented an attendance policy that would disparately affect him, mocked the way he walked, and that Silgan terminated him on March 21, 2024. Watters also alleged that he complained about workplace

conditions and the attendance policy, but he did not identify his disability, explain how it limited a major life activity, describe the attendance policy, or provide facts connecting his complaints to conduct prohibited by the ADA. His defamation allegation consisted only of the assertion that Silgan began defaming him after his termination.

PROCEDURAL HISTORY

Watters filed a complaint against his former employer alleging disability discrimination, retaliation, and defamation. Silgan filed a motion to dismiss, a corrected amended motion, and a motion asking the court to rule. After the court ordered Watters to respond and warned of dismissal for failure to prosecute, Watters responded. The court found that the complaint failed to state a claim but allowed Watters thirty days to file an amended complaint.

DISPOSITION

other

CASES CITED

- Roberts v. City of Chicago, 817 F.3d 561, 564-65 (7th Cir. 2016)
- Lavalais v. Village of Melrose Park, 734 F.3d 629, 632 (7th Cir. 2013)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555-56 (2007)
- Luevano v. Wal-Mart Stores, Inc., 722 F.3d 1014, 1027 (7th Cir. 2013)
- Arnett v. Webster, 658 F.3d 742, 751 (7th Cir. 2011)
- Graham v. St. John's United Methodist Church, 913 F. Supp. 2d 650, 654 (N.D. Ill. 2012)
- Hoppe v. Lewis Univ., 692 F.3d 833, 839 (7th Cir. 2012)
- Koty v. DuPage County, 900 F.3d 515, 519 (7th Cir. 2018)
- Pierce v. United Parcel Service, No. 01 C 5690, 2002 WL 992624, at *6 (N.D. Ill. May 15, 2002)
- Boykin v. Illinois Department of Juvenile Justice, 23-cv-4109, 2025 WL 640050, at *5-6 (N.D. Ill. Feb. 27, 2025)
- Dickerson v. Board of Trustees of Community College District No. 522, 657 F.3d 595, 601 (7th Cir. 2011)
- Griffin v. Milwaukee County, 369 F. App'x 741, 743 (7th Cir. 2010)
- Davis v. Ruby Foods, Inc., 269 F.3d 818, 820 (7th Cir. 2001)
- Zimmerman v. Bornick, 25 F.4th 491, 494 (7th Cir. 2022)
- Duda v. Board of Education of Franklin Park Public School District No. 84, 133 F.3d 1054, 1056-57 (7th Cir. 1998)