

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEBRASKA

Jonathan F. Ramos v. Columbus Hydraulics Company, LLC

No. 8:25-cv-00140, United States District Court for the District of Nebraska (November 26, 2025)

SUMMARY

The United States District Court for the District of Nebraska dismissed without prejudice Jonathan F. Ramos’s amended complaint against Columbus Hydraulics Company, LLC. Ramos alleged that the company refused to hire him because he is deaf, in violation of Title I of the Americans with Disabilities Act and the Nebraska Fair Employment Practice Act. The court held that he failed to plausibly allege that he was qualified for the welding position, identify reasonable accommodations, or provide nonconclusory facts showing that the refusal to hire was because of his disability.

CASE DETAILS

COURT	United States District Court for the District of Nebraska
JURISDICTION	United States District Court for the District of Nebraska
DECIDED	November 26, 2025
DOCKET	8:25-cv-00140
DISPOSITION	dismissed
PROCEDURAL POSTURE	Initial review of a pro se amended complaint filed by an in forma pauperis plaintiff under 28 U.S.C. § 1915(e)(2).
STANDARD OF REVIEW	On initial review under 28 U.S.C. § 1915(e)(2), the court must dismiss an in forma pauperis complaint that is frivolous, malicious, fails to state a claim upon which relief may be granted, or seeks monetary relief from an immune defendant. The court liberally construes a pro se complaint, but the complaint must allege facts sufficient to state a plausible claim for relief.
PRECEDENTIAL VALUE	unpublished district court memorandum and order; precedential status unknown
PARTIES	Jonathan F. Ramos v. Columbus Hydraulics Company, LLC

TOPICS

- ada discrimination
- disability discrimination
- reasonable accommodation
- pleadings
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the amended complaint plausibly alleged disability discrimination under Title I of the Americans with Disabilities Act.
2. Whether the amended complaint plausibly alleged a disability-discrimination claim under the Nebraska Fair Employment Practice Act.
3. Whether summary dismissal was appropriate under 28 U.S.C. § 1915(e)(2).

HOLDINGS

1. The amended complaint failed to plausibly allege that Plaintiff was qualified to perform the essential functions of the position because it alleged that he failed the welding test and refused an additional opportunity to take it.
2. The amended complaint failed to state a plausible disability-discrimination claim under Title I of the ADA or the companion provisions of the NFEPA.
3. The amended complaint was dismissed without prejudice for failure to state a claim upon which relief may be granted.

KEY QUOTATIONS

“Plaintiff’s complaint therefore fails to state a claim for disability discrimination.”

“Having liberally construed Plaintiffs pro se amended complaint, the Court finds Plaintiff has failed to allege a plausible disability discrimination claim under Title I of the ADA and its companion NFEPA provisions.”

FACTUAL BACKGROUND

Plaintiff is deaf, communicates using American Sign Language, and has limited English-language ability. He alleged that Columbus Hydraulics refused to hire him because of his hearing disability after he applied for welding positions. Plaintiff failed a welding test in 2021 and declined to retake it in 2023, and he did not allege facts explaining the accommodations he needed, why they were reasonable, or that the company refused to provide them.

PROCEDURAL HISTORY

Plaintiff filed his complaint on February 25, 2025, and was granted leave to proceed in forma pauperis. After initial review, the court granted leave to amend, and Plaintiff filed an amended complaint on October 20, 2025. The court conducted initial review of the amended complaint and dismissed it without prejudice for failure to state a claim.

DISPOSITION

dismissed

CASES CITED

- Ramos v. Cargill Meat Solutions Corp., 8:24CV455 (D. Neb.), Filing No. 1 at 7
- Nat'l Ass'n of the Deaf v. Trump, No. 20CV2107, 2020 WL 4452083 (Complaint ¶¶ 25-25)
- United States v. Jackson, 640 F.2d 614, 617 (8th Cir.)
- Topchian v. JPMorgan Chase Bank, N.A., 760 F.3d 843, 848-49 (8th Cir.)
- Hopkins v. Saunders, 199 F.3d 968, 973 (8th Cir.)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 569-70 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Stone v. Harry, 364 F.3d 912, 915 (8th Cir.)
- Martin v. Aubuchon, 623 F.2d 1282, 1286 (8th Cir.)
- Swierkiewicz v. Sorema N.A., 534 U.S. 506, 511-12 (2002)
- Rodriguez-Reyes v. Molina-Rodriguez, 711 F.3d 49, 54 (1st Cir.)
- Khalik v. United Air Lines, 671 F.3d 1188, 1192 (10th Cir.)
- Walz v. Ameriprise Fin., Inc., 779 F.3d 842, 845 (8th Cir.)
- Orr v. Wal-Mart Stores, Inc., 297 F.3d 720, 723 (8th Cir.)
- Amir v. St. Louis University, 184 F.3d 1017, 1027 (8th Cir.)
- Battle v. United Parcel Serv., Inc., 438 F.3d 856, 861 (8th Cir.)
- Chalfant v. Titan Distribution, Inc., 475 F.3d 982 (8th Cir.)
- Schaffhauser v. United Parcel Serv., Inc., 794 F.3d 899, 905 (8th Cir.)
- Brown v. Conagra Brands, Inc., 131 F.4th 624, 627 (8th Cir. 2025)