

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Janice Schmidt, et al. v. Standard Life Insurance Company, et al.

Schmidt · No. 1:21-cv-01784-JLT-CDB · Decided January 12, 2026

SUMMARY

The United States District Court for the Eastern District of California directs the Clerk to close a putative class action after the parties filed a stipulated dismissal with prejudice. The court concludes that Rule 23(e) does not require approval or notice because no class was certified and orders dismissal with prejudice as to the plaintiffs’ individual claims and without prejudice as to putative class claims.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	January 12, 2026
DOCKET	1:21-cv-01784-JLT-CDB
DISPOSITION	dismissed
PROCEDURAL POSTURE	In a putative class action, the parties jointly stipulated to dismissal with prejudice after a related class settlement received final approval in another federal action. The court determined that no court approval or notice was required under Federal Rule of Civil Procedure 23(e) because no class had been certified and no class was proposed for settlement in this action, and directed the clerk to close the case.
PRECEDENTIAL VALUE	nonprecedential

TOPICS

class actions civil procedure

PRACTICE AREAS

civil procedure class actions insurance

QUESTIONS PRESENTED

- Whether Federal Rule of Civil Procedure 23(e) required court approval or notice to putative class members before dismissal of this putative class action.

2. Whether the parties' stipulated dismissal required a court order under Federal Rule of Civil Procedure 41.

HOLDINGS

1. Rule 23(e) did not require court approval or notice because no class had been certified and no class had been proposed for certification for purposes of settlement in this action.
2. The parties' jointly executed stipulation satisfied Rule 41(a)(1)(A)(ii), so the action terminated by operation of law without further court order.

KEY QUOTATIONS

“Because no class has been certified, Titus is the only plaintiff before the court ...” (at 2)

“This action shall be terminated by operation of law without further order of the Court.” (at 2)

FACTUAL BACKGROUND

Plaintiffs brought a putative class action against Standard Life Insurance Company and Protective Life Insurance Company. The action had been stayed since December 12, 2023, while related Ninth Circuit matters and a settlement in another class action were resolved. The Southern District of California approved the related settlement on October 25, 2025, and the parties represented that it resolved the claims at issue in this case.

PROCEDURAL HISTORY

Janice Schmidt filed a class action complaint on December 17, 2021, and Judy A. Vann-Eubanks later joined as a plaintiff through the first amended complaint. The action was stayed pending related Ninth Circuit proceedings and approval of a class settlement in the Southern District of California. After that settlement received final approval, the parties filed a stipulated dismissal with prejudice on January 9, 2026. The court ordered the case closed, dismissing the plaintiffs' individual claims with prejudice and the putative class claims without prejudice.

DISPOSITION

dismissed

CASES CITED

- Titus v. BlueChip Financial, 786 Fed. App'x 694, 695 (9th Cir. 2019)
- Emp'rs-Teamsters Local Nos. 175 & 505 Pension Tr. Fund v. Anchor Capital Advisors, 498 F.3d 920, 924 (9th Cir. 2007)
- Comm. Space Mgmt. Co., Inc. v. Boeing Co., Inc., 193 F.3d 1074, 1077-78 (9th Cir. 1999)

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