

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

Austin v. Tesla Motors, Inc.

Austin · No. 23-cv-00067-AGT · Decided September 10, 2025

SUMMARY

The United States District Court for the Northern District of California denied George Jarvis Austin’s motions for a new trial, to alter or correct the judgment and dispositive order, and for assignment to a new judge. The court construed the requested judgment relief under Federal Rules of Civil Procedure 59(e) and 60(b)(1), concluding that Austin merely repeated arguments previously rejected on summary judgment and had not shown grounds for relief.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Alex G. Tse
JURISDICTION	United States District Court for the Northern District of California
DECIDED	September 10, 2025
DOCKET	23-cv-00067-AGT
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved under Federal Rules of Civil Procedure 59 and 60 for a new trial, alteration or correction of the judgment and dispositive order, and reassignment to another judge. The district court denied all requested relief.
STANDARD OF REVIEW	Rule 59(e) relief is discretionary and extraordinary, available for newly discovered evidence, clear error, or an intervening change in controlling law. Rule 60(b) relief is also discretionary and extraordinary, requiring exceptional circumstances.
PRECEDENTIAL VALUE	unpublished and nonprecedential district-court order
PARTIES	George Jarvis Austin v. Tesla Motors, Inc.

TOPICS

- motion for new trial
- motion for reconsideration
- summary judgment
- res judicata
- civil procedure

PRACTICE AREAS

civil procedure

employment law

remedies

QUESTIONS PRESENTED

1. Whether Austin was entitled to a new trial when no trial had occurred.
2. Whether Austin demonstrated grounds under Rule 59(e) to alter or amend the judgment based on alleged clear error concerning res judicata and summary judgment.
3. Whether Austin demonstrated mistake or exceptional circumstances warranting relief under Rule 60(b)(1).
4. Whether the court should permit Austin to present matters to the Executive Committee or refer the matter to another judge.

HOLDINGS

1. Austin was not entitled to a new trial because no trial had occurred in the action.
2. The Rule 59(e) motion was denied because Austin merely repeated arguments previously presented and rejected on summary judgment; Rule 59(e) may not be used to relitigate old matters.
3. The Rule 60(b)(1) motion was denied because Austin sought to reargue issues already decided and did not establish mistake, inadvertence, surprise, excusable neglect, or exceptional circumstances warranting relief.
4. The requests to have matters heard by the Executive Committee or referred to another judge were denied because motions must be directed to the judge assigned to the action absent authorization otherwise, and no basis existed to revisit the prior denial of recusal or disqualification.

KEY QUOTATIONS

“A district court may grant a Rule 59(e) motion if it is presented with newly discovered evidence, committed clear error, or if there is an intervening change in the controlling law.”

“A Rule 60(b) motion does not allow parties to reargue issues previously decided by the court.”

FACTUAL BACKGROUND

Austin asserted that Tesla committed new and ongoing adverse acts between January 26, 2021, and January 6, 2023. The court had previously determined on summary judgment that those allegations were in reality claims for relief based on wrongs allegedly occurring during Austin's employment with Tesla from 2019 to 2020. Austin's postjudgment motions repeated the same factual and legal arguments he had made in opposition to summary judgment.

PROCEDURAL HISTORY

The court had previously granted Tesla summary judgment after concluding that Austin's claims were barred by res judicata. Austin then filed motions seeking a new trial, alteration or correction of the judgment, and a new

judge. The court construed the requests as motions under Rule 59(e) and Rule 60(b)(1), denied them, and admonished Austin regarding duplicative filings.

DISPOSITION

other

CASES CITED

- Joe Hand Promotions, Inc. v. Munoz, No. 13-CV-05926, 2015 WL 351378 (N.D. Cal. Jan. 23, 2015)
- Bunyard v. Knowles, No. 03-CV-1280, 2007 WL 2156067 (N.D. Cal. July 26, 2007)
- Kemp v. United States, 596 U.S. 528, 539 (2022)
- Wood v. Ryan, 759 F.3d 1117, 1121 (9th Cir. 2014) (per curiam)
- Allstate Ins. Co. v. Herron, 634 F.3d 1101, 1111 (9th Cir. 2011)
- Stevens v. ITT Sys., Inc., 868 F.2d 1040, 1041 n.1 (9th Cir. 1989)
- Carter v. United States, 973 F.2d 1479, 1489 (9th Cir. 1992)
- Exxon Shipping Co. v. Baker, 554 U.S. 471, 485 n.5 (2008)
- Guenther v. Lockheed Martin Corp., 972 F.3d 1043, 1058 (9th Cir. 2020)
- Garcia v. Biter, 195 F. Supp. 3d 1131, 1133 (E.D. Cal. 2016)
- Am. Ironworks & Erectors, Inc. v. N. Am. Const. Corp., 248 F.3d 892, 899 (9th Cir. 2001)
- United States v. Westlands Water Dist., 134 F. Supp. 2d 1111, 1131 (E.D. Cal. 2001)