

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
ILLINOIS

Terrell Lott v. Comprehensive Behavioral Health Center of St. Clair
County, Inc.

Lott · No. 26-cv-259-RJD · Decided May 6, 2026

SUMMARY

The court granted Plaintiff Terrell Lott’s motion to remand an employment-related action to Illinois state court. After Plaintiff amended her complaint to remove references to the Fair Labor Standards Act, the court concluded that the amended complaint raised no federal question and that subject matter jurisdiction was lacking.

CASE DETAILS

COURT	United States District Court for the Southern District of Illinois
WRITING FOR THE COURT	Reona J. Daly
JURISDICTION	United States District Court for the Southern District of Illinois
DECIDED	May 6, 2026
DOCKET	26-cv-259-RJD
DISPOSITION	remanded
PROCEDURAL POSTURE	Plaintiff moved to remand an employment action that Defendant removed from Illinois state court on the asserted basis of federal-question jurisdiction. After Plaintiff amended the complaint to remove references to the FLSA and liquidated damages, Defendant conceded that federal-question jurisdiction did not exist.
STANDARD OF REVIEW	The court determined de novo whether the well-pleaded complaint presented a federal question and whether subject matter jurisdiction existed.
PRECEDENTIAL VALUE	district court order; precedential status not stated

TOPICS

- subject matter jurisdiction
- pleadings
- civil procedure
- whistleblower
- wage and hour

PRACTICE AREAS

civil procedure

employment law

federal jurisdiction

wage and hour

whistleblower retaliation

QUESTIONS PRESENTED

1. Whether the complaint, as amended to remove references to the FLSA and liquidated damages, presented a federal question supporting removal jurisdiction.
2. Whether the federal district court had subject matter jurisdiction over the action after Plaintiff filed the First Amended Complaint.

HOLDINGS

1. The First Amended Complaint did not raise a question of federal law because it omitted references to the FLSA and did not request liquidated damages.
2. Because the First Amended Complaint did not raise a federal question, the district court lacked subject matter jurisdiction and was required to remand the case to state court.

FACTUAL BACKGROUND

Plaintiff formerly worked as an assistant manager for Defendant's residential transitional living program for individuals with serious mental health disabilities. She alleged that she reported discriminatory and abusive conduct toward residents, was retaliated against and terminated, and was required to remain on call without pay. Her original complaint asserted Illinois statutory claims but referred to the FLSA, her status as a non-exempt employee, and liquidated damages.

PROCEDURAL HISTORY

Plaintiff originally filed the action in the Circuit Court of St. Clair County, Illinois, asserting claims under Illinois statutes. Defendant removed the action to the United States District Court for the Southern District of Illinois, arguing that references to the FLSA and liquidated damages created federal-question jurisdiction. The court granted Plaintiff leave to amend, Plaintiff filed an amended complaint omitting the FLSA references and liquidated-damages request, and the court granted Plaintiff's motion to remand.

DISPOSITION

remanded

REMAND INSTRUCTIONS

The case was remanded to the Circuit Court of the 20th Judicial Circuit, St. Clair County, Illinois.

CASES CITED

- Caterpillar Inc. v. Williams, 482 U.S. 386, 392 (1987)

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