

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MISSOURI, EASTERN DIVISION

Artrelle Fowler v. DoorDash Essentials, LLC d/b/a DoorDash, et al.

Fowler · No. No. 4:25-CV-1097 HEA · Decided December 5, 2025

SUMMARY

The United States District Court for the Eastern District of Missouri denied Artrelle Fowler’s motion to remand an employment-discrimination action removed from Missouri state court. The court held that defendants established by a preponderance of the evidence that the amount in controversy exceeded \$75,000 and found that the nondiverse defendant was fraudulently joined because the Missouri Human Rights Act preempted the common-law emotional-distress claim. The case therefore remained in federal court under diversity jurisdiction.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Eastern Division
JURISDICTION	United States District Court for the Eastern District of Missouri
DECIDED	December 5, 2025
DOCKET	No. 4:25-CV-1097 HEA
DISPOSITION	remanded
PROCEDURAL POSTURE	Plaintiff moved to remand a state-law employment discrimination action that defendants removed on the basis of diversity jurisdiction. The court denied the motion to remand.
STANDARD OF REVIEW	The removing party bears the burden of establishing federal subject matter jurisdiction. The amount in controversy must be established by a preponderance of the evidence when challenged. A fraudulent-joinder determination asks whether the plaintiff's claim against the nondiverse defendant has any reasonable basis in fact and law.
PRECEDENTIAL VALUE	unknown
PARTIES	Artrelle Fowler v. DoorDash Essentials, LLC d/b/a DoorDash, Jerod Wright, et al.

TOPICS

- subject matter jurisdiction
- civil procedure
- employment discrimination
- retaliation
- racial discrimination

PRACTICE AREAS

civil procedure

employment law

employment discrimination

civil rights

QUESTIONS PRESENTED

1. Whether the amount in controversy exceeded \$75,000 for purposes of diversity jurisdiction.
2. Whether the presence of Wright defeated complete diversity because Fowler alleged that Wright was a Missouri citizen.
3. Whether Wright was fraudulently joined because the Missouri Human Rights Act preempted Fowler's common-law emotional-distress claim based on the same conduct.
4. Whether the action should be remanded to state court for lack of subject matter jurisdiction.

HOLDINGS

1. Defendants established by a preponderance of the evidence that the amount in controversy exceeded \$75,000.
2. Wright was fraudulently joined because Fowler's common-law emotional-distress claim against him was based on the same conduct underlying Fowler's MHRA claims, and the MHRA provided the exclusive remedy for that conduct.
3. Remand was unwarranted because federal subject matter jurisdiction existed under 28 U.S.C. § 1332 after disregarding the fraudulently joined defendant.

KEY QUOTATIONS

“if it is clear under governing state law that the complaint does not state a cause of action against the non-diverse defendant, the joinder is fraudulent and federal jurisdiction of the case should be retained.” (8)

“The Court finds Defendant Wright has been fraudulently joined in this cause of action, and to the extent he is a citizen of Missouri, his presence does not defeat diversity jurisdiction.” (9)

“Accordingly, IT IS HEREBY ORDERED that Plaintiff Artelle Fowler’s Motion to Remand is DENIED.” (10)

FACTUAL BACKGROUND

Fowler alleged that he was employed by DoorDash and that his supervisor, Jerod Wright, sent a racially derogatory text directed at African Americans. Fowler alleged that he complained about the text, was retaliated against, and was terminated. He asserted Missouri Human Rights Act claims for racial discrimination, color discrimination, retaliation, and hostile work environment, along with a common-law emotional-distress claim against Wright. Defendants submitted settlement demands seeking as much as \$5 million in compensatory damages and proposing settlement for \$1 million, plus travel expenses and tuition assistance.

PROCEDURAL HISTORY

Fowler filed suit in the Circuit Court of St. Louis County, Missouri, asserting Missouri Human Rights Act claims against DoorDash and a common-law emotional-distress claim against Wright. Defendants removed the action on July 25, 2025, alleging complete diversity and an amount in controversy exceeding \$75,000, and alternatively asserting that Wright was fraudulently joined. Fowler moved to remand, arguing that he and Wright were both Missouri citizens and that the amount in controversy was insufficient. The district court denied remand after finding that the amount-in-controversy requirement was satisfied and that Wright was fraudulently joined.

DISPOSITION

remanded

REMAND INSTRUCTIONS

None. The motion to remand was denied; the case was retained in federal court.

CASES CITED

- Buckley v. Control Data Corp., 923 F.2d 96, 97 n.6 (8th Cir. 1991)
- Junk v. Terminix Int'l Co., 628 F.3d 439, 445 (8th Cir. 2010)
- Knudson v. Sys. Painters, Inc., 634 F.3d 968, 975-77 (8th Cir. 2011)
- Exxon Mobil Corp. v. Allapattah Servs., Inc., 545 U.S. 546, 564 (2005)
- Pudlowski v. The St. Louis Rams, LLC, 829 F.3d 963, 964 (8th Cir. 2016)
- Dart Cherokee Basin Operating Co., LLC v. Owens, 574 U.S. 81, 89 (2014)
- Gibson v. Clean Harbors Env't Servs., Inc., 840 F.3d 515, 521 (8th Cir. 2016)
- Cent. Iowa Power Co-op. v. Midwest Indep. Transmission Sys. Operator, Inc., 561 F.3d 904, 912 (8th Cir. 2009)
- City of Univ. City, Missouri v. AT & T Wireless Servs., Inc., 229 F. Supp. 2d 927, 929 (E.D. Mo. 2002)
- Bell v. Hershey Co., 557 F.3d 953, 959 (8th Cir. 2009)
- Am. Fam. Mut. Ins. Co. v. Vein Centers for Excellence, Inc., 912 F.3d 1076, 1081 (8th Cir. 2019)
- Bivens v. Geico Ins. Co., No. 4:24-CV-93 CDP, 2024 WL 1091793, at *2 (E.D. Mo. Mar. 12, 2024)
- Katwala v. Badger, No. 4:23-CV-1230 SRW, 2023 WL 8004946, at *3 (E.D. Mo. Nov. 17, 2023)
- Parshall v. Menard, Inc., No. 4:16-CV-828 CEJ, 2016 WL 3916394, at *4 (E.D. Mo. July 20, 2016)
- Filla v. Norfolk S. Ry. Co., 336 F.3d 806, 810-11 (8th Cir. 2003)
- Johnson v. Midwest Div. - RBH, LLC, 88 F.4th 731, 735-36 (8th Cir. 2023)
- State ex rel. Church & Dwight Co. v. Collins, 543 S.W.3d 22, 28 (Mo. 2018)