

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Tyer v. Doordash, Inc.

Tyer · No. Civil Action No. 25-2001 (TJK) · Decided February 13, 2026

SUMMARY

The United States District Court for the District of Columbia granted DoorDash, Inc.’s motion to dismiss a negligence action arising from a car accident involving a DoorDash driver. The court held that the complaint failed to plausibly allege that DoorDash’s alleged failure to ensure the driver had insurance proximately caused the accident.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Timothy J. Kelly
JURISDICTION	United States District Court for the District of Columbia
DECIDED	February 13, 2026
DOCKET	Civil Action No. 25-2001 (TJK)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff sued DoorDash in the District of Columbia Superior Court for negligence arising from a vehicle collision. DoorDash removed the action to the United States District Court for the District of Columbia and moved to dismiss under Federal Rule of Civil Procedure 12(b)(6).
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court determines whether the complaint states a claim for relief that is plausible on its face, accepting well-pleaded factual allegations as true and viewing them in the light most favorable to the plaintiff. Proximate cause may be resolved as a matter of law when the allegations do not support a reasonable finding of proximate cause.
PRECEDENTIAL VALUE	published district court memorandum opinion

TOPICS

- negligence
- proximate cause
- motions to dismiss
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the complaint plausibly alleged that DoorDash's alleged failure to ensure that Griffin had automobile insurance proximately caused Tyler's injuries.
2. Whether the negligence claim should be dismissed under Federal Rule of Civil Procedure 12(b)(6) for failure to plausibly allege proximate cause.

HOLDINGS

1. The complaint did not plausibly allege that DoorDash's purported failure to ensure that Griffin had insurance caused Tyler's accident and injuries.
2. Dismissal was proper because the complaint's allegations were insufficient to sustain a negligence claim against DoorDash.

KEY QUOTATIONS

"A complaint must 'state a claim to relief that is plausible on its face' to survive a motion to dismiss under Federal Rule of Civil Procedure 12(b)(6)." (1)

"Proximate cause is 'that cause which, in natural and continual sequence, unbroken by any efficient intervening cause, produces the injury and without which the result would not have occurred.'" (2)

"But when multiple proximate causes are alleged, the plaintiff must at least allege facts that support the inference that the defendant's breach was a 'substantial factor' in causing the injury." (3)

FACTUAL BACKGROUND

In June 2022, Diwann Tyler's vehicle collided with a vehicle driven by Monique Griffin. Tyler alleged that Griffin caused the accident through negligent driving, including speeding, following too closely, failing to pay attention, and running a red light. Tyler alleged that DoorDash was negligent because Griffin was uninsured and had been allowed to use DoorDash's application and make deliveries. Griffin had allegedly completed her last delivery and was on her way home when the collision occurred.

PROCEDURAL HISTORY

Tyler alleged that DoorDash negligently allowed an uninsured driver to access its application and make deliveries. DoorDash removed the case from the D.C. Superior Court and moved to dismiss, arguing that the complaint failed to allege a duty and proximate causation. The court granted the motion and dismissed the case because the complaint did not plausibly allege that DoorDash's alleged failure to ensure insurance caused the accident.

DISPOSITION

dismissed

CASES CITED

- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Hakki v. Zima Co., No. 03-9183, 2006 WL 852126, at *5 (D.C. Super. Ct. Mar. 28, 2006)
- District of Columbia v. Freeman, 477 A.2d 713, 716 (D.C. 1984)
- District of Columbia v. Fowler, 497 A.2d 456, 462 n.13 (D.C. 1985)
- St. Paul Fire & Marine Insurance Co. v. James G. Davis Construction Corp., 350 A.2d 751, 752 (D.C. 1976)
- Wagshal v. District of Columbia, 216 A.2d 172, 175 (D.C. 1966)
- Lacy v. District of Columbia, 424 A.2d 317, 320-22 (D.C. 1980)
- Ferrell v. Rosenbaum, 691 A.2d 641, 650 (D.C. 1997)

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