

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

Robert T. King v. City of St. Louis

No. 4:24-CV-1594-ZMB · No. 4:24-CV-1594-ZMB · Decided January 23, 2026

SUMMARY

The United States District Court for the Eastern District of Missouri denies the St. Louis Board of Police Commissioners’ motions to substitute itself for the City of St. Louis and to substitute counsel under Federal Rule of Civil Procedure 25(c). The court concludes that substitution is inappropriate because the Board withdrew its consent, asserted defenses unavailable to the City, and substitution could prejudice the plaintiff. The plaintiff’s ADA and Missouri Human Rights Act claims therefore remain pending against the City, without prejudice to other mechanisms for adding or removing parties.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Eastern Division
WRITING FOR THE COURT	Zachary M. Bluestone
JURISDICTION	United States District Court for the Eastern District of Missouri, Eastern Division
DECIDED	January 23, 2026
DOCKET	4:24-CV-1594-ZMB
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff filed suit in state court; defendants removed the action to federal court. After amendment of the complaint and partial dismissal of claims, the St. Louis Board of Police Commissioners moved to substitute itself and its counsel for the City of St. Louis under Federal Rule of Civil Procedure 25(c), then moved to withdraw those requests.
STANDARD OF REVIEW	The decision whether to substitute parties under Rule 25(c) lies within the trial court's discretion.
PRECEDENTIAL VALUE	Unknown; memorandum and order from a federal district court

TOPICS

civil procedure

joinder

ada / disability

reasonable accommodation

statutory interpretation

PRACTICE AREAS

civil procedure

civil rights

disability discrimination

municipal law

QUESTIONS PRESENTED

1. Whether the St. Louis Board of Police Commissioners should be substituted for the City of St. Louis under Federal Rule of Civil Procedure 25(c).
2. Whether substitution should be denied because the Board withdrew its consent, would assert defenses unavailable to the City, and substitution could prejudice the plaintiff.

HOLDINGS

1. Substitution was not appropriate under the circumstances because the Board withdrew its consent, sought to assert Eleventh Amendment immunity unavailable to the City, and substitution could prejudice King.
2. Denial of substitution did not foreclose other mechanisms for adding the Board, including an amended complaint, joinder, or impleader.

KEY QUOTATIONS

“This procedure allows “an action to continue unabated when an interest in a lawsuit changes hands, rather than requiring the initiation of an entirely new lawsuit.”” (Legal Standard)

“The key feature of a “substituted party” is that it “merely steps into the same position of the original party.”” (Discussion)

“In any case, a defining feature of Rule 25(c) is that it is a procedural measure.” (Discussion)

FACTUAL BACKGROUND

King alleges that the St. Louis Metropolitan Police Department denied him reasonable accommodation, benefits, and wages because of a disability arising from a 2018 work-related injury, and retaliated against him for asserting rights under the ADA and Missouri Human Rights Act. The SLMPD returned to state control after Missouri enacted legislation in March 2025. The Board initially sought to replace the City as a defendant but later changed its position, asserting that it accepted responsibility only for obligations arising after the transfer and that it had Eleventh Amendment immunity from the ADA claims.

PROCEDURAL HISTORY

King originally filed the action in state court, and defendants removed it in late 2024. King amended his complaint after an initial motion to dismiss. At a hearing, the Court granted defendants' partial motion to dismiss, leaving ADA and Missouri Human Rights Act claims against the City. The Board then sought substitution based on the SLMPD's return to state control, later withdrew its requests, and the Court denied substitution while denying the withdrawal motions as moot.

DISPOSITION

other

CASES CITED

- State ex rel. Hawley v. City of St. Louis, 531 S.W.3d 602, 604 (Mo. Ct. App. 2017)
- Holmes v. Steelman, 624 S.W.3d 144, 147 (Mo. banc 2021)
- Banks v. Slay, 875 F.3d 876, 880 n.7 (8th Cir. 2017)
- Holmes v. Zellers, 2025 WL 2110585, at *6 (Mo. Ct. App. July 29, 2025)
- Clark v. City of St. Louis, No. 4:21-CV-788-JMD, Doc. 212 (E.D. Mo. Sept. 30, 2025)
- Gatlin v. Welle, No. 4:25-CV-43-ACL, 2026 WL 60356, at *3 (E.D. Mo. Jan. 5, 2026)
- Edwards v. Baer, 863 F.2d 606, 609 (8th Cir. 1988)
- Swink v. Love, No. 4:25-CV-569-ZMB, Doc. 40 at 32 (E.D. Mo. Oct. 10, 2025)
- ELCA Enters. v. Sisco Equip. Rental & Sales, 53 F.3d 186, 191 (8th Cir. 1995)
- Froning's, Inc. v. Johnston Feed Serv., 568 F.2d 108, 110 n.4 (8th Cir. 1978)
- C.F.C.S. Invs., LP v. Transamerica Occidental Life Ins. Co., No. 4:16-CV-396-JAR, 2017 WL 282403, at *2 (E.D. Mo. Jan. 23, 2017)
- Couf v. Equitable Life Assurance Soc'y, 2003 WL 27384629, at *2 (D. Minn. Dec. 17, 2003)
- Potvin v. Speedway LLC, 891 F.3d 410, 416 (1st Cir. 2018)
- In re Covington Grain Co., 638 F.2d 1357, 1361 (5th Cir. 1981)