

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

Mary J. Baker v. St. Louis NH, LLC et al.

Baker v. St. Louis NH, LLC, Case No. 4:24-cv-00234-SRC (E.D. Mo. May 22, 2026) · No. 4:24-cv-00234-SRC
· Decided May 22, 2026

SUMMARY

The United States District Court for the Eastern District of Missouri sanctioned attorney Johnathan Steele and The Steele Law Firm under Federal Rule of Civil Procedure 11 for filing a settlement declaration on behalf of Maria Loper without a reasonable factual inquiry into its contents or her competency. The court found that Steele’s concurrent representation of Mary Baker and Maria Loper created a conflict of interest and that Maria’s interests were inadequately protected until the court appointed a guardian ad litem. The court imposed a \$12,250 monetary sanction payable to the wrongful-death beneficiaries and referred the matter to the Missouri Office of Disciplinary Counsel.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Eastern Division
WRITING FOR THE COURT	Stephen R. Clark
JURISDICTION	United States District Court for the Eastern District of Missouri, Eastern Division
DECIDED	May 22, 2026
DOCKET	4:24-cv-00234-SRC
DISPOSITION	other
PROCEDURAL POSTURE	After approving a revised wrongful-death settlement, the court ordered attorney Johnathan Steele to show cause why he should not be sanctioned for ethical and procedural violations. The memorandum and order resolves the show-cause proceeding and imposes Rule 11 sanctions.
STANDARD OF REVIEW	An award of Rule 11 sanctions is reviewed for abuse of discretion; imposition of sanctions is discretionary with the district court.
PRECEDENTIAL VALUE	unreported district court memorandum and order; precedential status not stated

PARTIES

Mary J. Baker v. St. Louis NH, LLC et al.

TOPICS

sanctions

civil procedure

guardianship procedure

wrongful death

PRACTICE AREAS

civil procedure

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wrongful death

guardianship procedure

legal ethics

QUESTIONS PRESENTED

1. Whether Steele violated Federal Rule of Civil Procedure 11 by filing Maria Loper's declaration without a reasonable inquiry and without evidentiary support for its factual assertions.
2. Whether the court could impose sanctions after providing Steele notice and an opportunity to respond.
3. What sanctions were appropriate for the Rule 11 violation.

HOLDINGS

1. Steele violated Federal Rule of Civil Procedure 11(b)(3) because he filed Maria's declaration while certifying factual assertions that he knew, or after reasonable investigation should have known, were false or wholly unsupported.
2. The court could impose sanctions because Steele received notice of the alleged Rule 11 violation and an opportunity to be heard through the show-cause order and his response.
3. A monetary sanction of \$12,250 was appropriate, and the amount was ordered paid directly to the wrongful-death beneficiaries in proportion to their settlement shares rather than to the court.

KEY QUOTATIONS

"Before imposing sanctions, the Court must provide counsel with both notice and an opportunity to be heard." (at 4)

"Rule 11 "imposes a duty on attorneys to certify that they have conducted a reasonable inquiry and have determined that any papers filed with the court are well grounded in fact."" (at 5)

"The Court finds that, when filing Maria's declaration, he violated his "duty . . . to certify that [he has] conducted a reasonable inquiry and . . . determined that [the declaration is] well[-]grounded in fact."" (at 12)

FACTUAL BACKGROUND

Attorney Johnathan Steele represented Mary Baker in a wrongful-death action and told the court that he also represented Maria Loper, one of the surviving beneficiaries. Steele supported a proposed settlement under which Maria would receive nothing because of her public benefits, despite Maria's intellectual disability and the conflicting interests of the beneficiaries. After questioning Maria and finding her incompetent, the court appointed a guardian ad litem, who determined that Maria should receive 38.75% of the settlement in a special-

needs trust. Steele had drafted and filed a declaration purportedly stating Maria's informed consent to the settlement, but admitted that he had not discussed Maria's settlement wishes with her before drafting it.

PROCEDURAL HISTORY

Baker filed negligence and wrongful-death claims against multiple defendants arising from her mother's death in a nursing home. After Baker dismissed some defendants and claims, only her wrongful-death claim against St. Louis NH remained. During settlement approval, the court questioned Steele's dual representation of Baker and Maria Loper, found Maria incompetent, appointed a guardian ad litem, and approved a revised allocation placing Maria's share in a special-needs trust. The court then issued a show-cause order, received Steele's response, found a Rule 11 violation, imposed monetary sanctions, and referred the matter to the Missouri Office of Disciplinary Counsel.

DISPOSITION

other

CASES CITED

- *Miess v. Port City Trucking, Inc.*, No. 4:09-cv-01124 CDP, 2010 WL 2519622, at *1 (E.D. Mo. June 14, 2010)
- *Floyd v. Shaw*, 830 S.W.2d 564, 566 (Mo. Ct. App. 1992)
- *Stevenson v. Union Pac. R. Co.*, 354 F.3d 739, 745 (8th Cir. 2004)
- *Chambers v. NASCO, Inc.*, 501 U.S. 32, 44-45 (1991)
- *Plaintiffs' Baycol Steering Comm. v. Bayer Corp.*, 419 F.3d 794, 802 (8th Cir. 2005)
- *Adams v. USAA Cas. Ins. Co.*, 863 F.3d 1069, 1077 (8th Cir. 2017)
- *Cooter & Gell v. Hartmarx Corp.*, 496 U.S. 384, 393 (1990)
- *King v. Whitmer*, 71 F.4th 511, 521 (6th Cir. 2023)
- *Coonts v. Potts*, 316 F.3d 745, 753 (8th Cir. 2003)
- *Teamsters Nat'l Freight Indus. Negotiating Comm. ex rel. Teamster Loc. Union Nos. 116, 120, 123, 346, & 544 v. MME, Inc.*, 104 F.3d 364, 364 (8th Cir. 1996) (per curiam)
- *Bus. Guides, Inc. v. Chromatic Commc'ns Enters., Inc.*, 498 U.S. 533, 544-45 (1991)
- *Dorsey v. Dorsey*, 156 S.W.3d 442, 444-52 (Mo. App. 2005)
- *State v. Collins*, 718 S.W.3d 130, 139-41 (Mo. Ct. App. 2025)
- *Lee v. Hiler*, 141 S.W.3d 517, 522-26 (Mo. Ct. App. 2004)
- *Broughton v. Esurance Ins. Co.*, 466 S.W.3d 1, 11 (Mo. Ct. App. 2015)
- *Jones v. Missouri Department of Mental Health*, No. 4:25-cv-00080-SRW, 2025 WL 275859, at *1-*2 (E.D. Mo. Jan. 23, 2025)
- *United States v. Wofford*, 562 F.2d 582, 586 (8th Cir. 1977)

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