UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF ILLINOIS

Sabrina Archibald and Sade Archibald v. Scott Credit Union

Archibald · No. 25-cv-01031-JPG · Decided March 13, 2026

SUMMARY

The United States District Court for the Southern District of Illinois denied Sabrina and Sade Archibald's request for judicial notice and an equitable accounting concerning an alleged unsettled debt. The court held that the requested facts were not relevant to the plaintiffs' claims and that the plaintiffs had not shown the absence of an adequate remedy at law or sufficiently complicated accounts warranting an equitable accounting.

CASE DETAILS

COURT	United States District Court for the Southern District of Illinois
WRITING FOR THE COURT	J. Phil Gilbert
JURISDICTION	United States District Court for the Southern District of Illinois
DECIDED	March 13, 2026
DOCKET	25-cv-01031-JPG
DISPOSITION	other
PROCEDURAL POSTURE	The court construed Plaintiffs' filing titled Judicial Notice and Demand for Equitable Accounting on Unsettled Debt as a motion and denied it.
STANDARD OF REVIEW	The court applied relevance under Federal Rule of Evidence 401 and exercised broad discretion in determining whether to order an equitable accounting.
PRECEDENTIAL VALUE	unpublished district court memorandum and order
PARTIES	Sabrina Archibald, Sade Archibald v. Scott Credit Union

TOPICS

accounting · equitable relief · judicial notice · evidence · civil procedure

PRACTICE AREAS

civil procedure · equitable remedies · consumer credit · evidence

QUESTIONS PRESENTED

1. Whether the court should take judicial notice of alleged deficiencies and current-status facts concerning the loan account.
2. Whether Plaintiffs were entitled to an equitable accounting before resolution of the case.

HOLDINGS

1. The court declined to take judicial notice because the requested facts were not relevant to Plaintiffs' claims concerning disclosures made in 2021 and debt-collection practices and communications from 2023 through 2025.
2. Plaintiffs were not entitled to an equitable accounting because they failed to show that they lacked an adequate remedy at law or that the accounts were so complicated that only a court of equity could satisfactorily unravel them.

KEY QUOTATIONS

> *"For this Court to take judicial notice of a fact, it must find that the fact is relevant."* (at 1)

> *"However, there is a prerequisite: the plaintiff must not have an adequate remedy at law."* (at 1)

> *"the plaintiff must be able to show that the 'accounts between the parties' are of such a 'complicated nature' that only a court of equity can satisfactorily unravel them."* (at 1-2)

FACTUAL BACKGROUND

Plaintiffs' claims concern whether Scott Credit Union made adequate disclosures when the parties executed a 2021 loan agreement and whether its debt-collection practices and communications from 2023 through 2025 complied with applicable law. Plaintiffs sought judicial notice that the record lacked a complete account of charges, fees, credits, payments, post-default activity, ownership information, and settlement or discharge documentation. They also sought an equitable accounting of the alleged unsettled debt.

PROCEDURAL HISTORY

Plaintiffs filed a request seeking judicial notice of alleged deficiencies in the account record and an equitable accounting. Defendant responded. The district court declined to take judicial notice of the requested facts and denied the requested accounting.

DISPOSITION

other

CASES CITED

- First Commodity Traders, Inc. v. Heinold Commodities, Inc., 766 F.2d 1007, 1011 (7th Cir. 1985)
- Dairy Queen, Inc. v. Wood, 369 U.S. 469, 478 (1962)