

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Jonathan Graham v. Stryker Corporation, et al.

No. 2:24-CV-01411-DJC-JDP (E.D. Cal. Dec. 4, 2025) · No. 2:24-CV-01411-DJC-JDP · Decided December 5, 2025

SUMMARY

The United States District Court for the Eastern District of California denied Stryker Employment Company, LLC’s motion to amend its answer in Jonathan Graham’s wage-and-hour class action. The court held that the motion was subject to Federal Rule of Civil Procedure 16 because it was filed after the scheduling-order deadline, and that Stryker had not shown the required diligence and good cause. The proposed amendments included offset and arbitration defenses and revisions to existing defenses.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Daniel A. Calabretta
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	December 5, 2025
DOCKET	2:24-CV-01411-DJC-JDP
DISPOSITION	other
PROCEDURAL POSTURE	Defendant Stryker Employment Company, LLC moved for leave to amend its answer to add offset and arbitration affirmative defenses and clarify existing defenses. The motion was denied.
STANDARD OF REVIEW	Under Federal Rule of Civil Procedure 16(b), modification of a scheduling-order deadline requires good cause and the judge's consent; good cause primarily turns on the diligence of the party seeking amendment.
PRECEDENTIAL VALUE	Unknown

TOPICS

- motion to amend
- affirmative defenses
- civil procedure
- wage and hour
- class actions

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether a motion to amend an answer filed after the scheduling-order deadline is governed by Federal Rule of Civil Procedure 16 rather than Rule 15.
2. Whether Stryker demonstrated the Rule 16(b)(4) good cause required to amend the scheduling order and add the proposed affirmative defenses.

HOLDINGS

1. Once the deadline for amending pleadings in a scheduling order has passed, Rule 16 governs the requested amendment, and the moving party must first show good cause before the court considers whether amendment is proper under Rule 15.
2. Stryker did not establish good cause because it was not diligent in seeking to add the offset and arbitration defenses.

KEY QUOTATIONS

“Under Rule 16(b), “[a] schedule may be modified only for good cause and with the judge’s consent.””
(Analysis at 1)

“If the party seeking the modification “was not diligent, the inquiry should end.”” (Analysis at 5)

FACTUAL BACKGROUND

Graham brought a California Labor Code wage-and-hour class action against Stryker. Stryker sought to add an offset defense based on an alleged commission overpayment and an arbitration defense based on arbitration agreements involving certain putative class members. Although Stryker asserted that the overpayment was discovered in June 2025 and that the arbitration issue became significant after denial of bifurcation, the court found that Stryker possessed or should have assessed the relevant information before the March 12, 2025 amendment deadline.

PROCEDURAL HISTORY

Graham filed a California wage-and-hour class action in state court, and Stryker removed it to the Eastern District of California. The court denied Graham's motion to remand, dismissed two Stryker entities by stipulation, issued a scheduling order setting a deadline for amendments to pleadings, and later denied Stryker's motion to bifurcate. Stryker then moved to amend its answer after the amendment deadline; the court denied the motion for lack of good cause under Rule 16.

DISPOSITION

other

CASES CITED

- *Coleman v. Quaker Oats Co.*, 232 F.3d 1271, 1294 (9th Cir. 2000)
- *Johnson v. Mammoth Recreations, Inc.*, 975 F.2d 604, 608-09 (9th Cir. 1992)
- *Phila. Indemn. Ins. Co. v. IEC Corp.*, No. 8:16-cv-00295-DOC-DFM, 2017 WL 5664988, at *3 (C.D. Cal. July 27, 2017)
- *U.S. Dominator, Inc. v. Factory Ship Robert E. Resoff*, 768 F.2d 1099, 1104 (9th Cir. 1985)
- *Bastidas v. Chappell*, 791 F.3d 1155 (9th Cir. 2015)
- *AmerisourceBergen Corp. v. Dialysist West, Inc.*, 465 F.3d 946, 952 (9th Cir. 2006)
- *Wake Forest Acquisitions, L.P. v. Vanderbilt Com. Lending, Inc.*, No. 2:15-cv-02167-KJM-DB, 2018 WL 1586362, at *3 (E.D. Cal. Apr. 2, 2018)
- *Cervantes v. Zimmerman*, Nos. 17-cv-1230-BAS-NLS, 18-cv-1062-BAS-NLS, 2019 WL 1129154, at *5 (S.D. Cal. Mar. 12, 2019)
- *Powell v. County of Solano*, No. 2:19-cv-02459-JAM-DB, 2022 WL 484837, at *2 (E.D. Cal. Feb. 16, 2022)