

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

William Crigler v. XPO, Inc., et al.

Crigler v. XPO · No. 5:25-cv-01776-MRA-JPR · Decided December 5, 2025

SUMMARY

The United States District Court for the Central District of California granted William Crigler’s motion to remand his employment-related action against XPO, Inc. and Sandra Coyle to San Bernardino County Superior Court. The court held that Coyle was not fraudulently joined because there was at least some possibility that the complaint stated a viable racial-harassment claim against her under California’s Fair Employment and Housing Act, defeating complete diversity. The court denied Crigler’s request for attorney’s fees and directed the clerk to close the federal case.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Monica Ramirez Almadani
JURISDICTION	United States District Court for the Central District of California
DECIDED	December 5, 2025
DOCKET	5:25-cv-01776-MRA-JPR
DISPOSITION	remanded
PROCEDURAL POSTURE	Plaintiff moved to remand an employment-related action removed from California state court on the asserted basis of diversity jurisdiction. Defendants opposed remand, arguing that the nondiverse individual defendant was fraudulently joined.
STANDARD OF REVIEW	The court independently assessed whether subject matter jurisdiction existed and whether removal was proper. On fraudulent joinder, the removing defendants bore the burden to show that the plaintiff could not possibly state a viable claim against the nondiverse defendant under settled state-law rules.
PRECEDENTIAL VALUE	unpublished
PARTIES	William Crigler v. XPO, Inc., Sandra Coyle

TOPICS

subject matter jurisdiction

civil procedure

employment discrimination

hostile work environment

PRACTICE AREAS

civil procedure

employment law

civil rights

QUESTIONS PRESENTED

1. Whether Coyle was fraudulently joined such that her California citizenship could be disregarded for purposes of diversity jurisdiction.
2. Whether the allegations against Coyle presented at least a possibility that a California court would find a viable FEHA harassment claim.
3. Whether Crigler was entitled to attorney's fees under 28 U.S.C. § 1447(c) for obtaining remand.

HOLDINGS

1. Coyle was not fraudulently joined because there was at least some possibility that a California state court would find that Crigler's complaint stated a FEHA harassment claim against her. Because Crigler and Coyle were both California citizens, complete diversity was absent and the federal court lacked subject matter jurisdiction; remand was therefore required.
2. Crigler was not entitled to attorney's fees under 28 U.S.C. § 1447(c) because the defendants had an objectively reasonable basis for removal, notwithstanding the court's conclusion that remand was required.

KEY QUOTATIONS

“if there is a possibility that a state court would find that the complaint states a cause of action against any of the resident defendants, the federal court must find that the joinder was proper and remand the case to the state court.” (at 4)

“The Court disagrees with Defendants that no reasonable person would find that these interactions created a hostile work environment.” (at 5)

“Because Defendants’ arguments go to the sufficiency of the complaint, rather than to the possible viability of Plaintiff’s claims against Coyle, they do not establish fraudulent joinder.” (at 5)

FACTUAL BACKGROUND

Crigler, a Black male sales representative employed by XPO from January 9, 2023, through November 1, 2024, alleged that his supervisor, Sandra Coyle, subjected him to race-based harassment. The alleged conduct included demeaning comments, micromanagement, heightened scrutiny, harsher discipline than similarly situated non-Black employees, and placement on a performance improvement plan. Crigler asserted a FEHA racial-harassment claim against both XPO and Coyle.

PROCEDURAL HISTORY

Crigler filed the action in San Bernardino County Superior Court on April 16, 2025, asserting California employment-law claims against XPO and Coyle. Defendants removed the action to federal court on July 14, 2025, asserting diversity jurisdiction and fraudulent joinder of Coyle. Crigler moved to remand, and the district court granted the motion, denied his request for attorney's fees, remanded the action to state court, and directed the clerk to close the federal case.

DISPOSITION

remanded

REMAND INSTRUCTIONS

The action is remanded to San Bernardino County Superior Court, Case No. CIVSB2510688. The clerk is directed to close the federal case.

CASES CITED

- Kokkonen v. Guardian Life Insurance Co. of America, 511 U.S. 375, 377 (1994)
- Owen Equipment & Erection Co. v. Kroger, 437 U.S. 365, 373 (1978)
- Caterpillar Inc. v. Williams, 482 U.S. 386, 392 (1987)
- Abrego Abrego v. The Dow Chemical Co., 443 F.3d 676, 685 (9th Cir. 2006)
- Gaus v. Miles, Inc., 980 F.2d 564, 566 (9th Cir. 1992)
- Duncan v. Stuetzle, 76 F.3d 1480, 1485 (9th Cir. 1996)
- Libhart v. Santa Monica Dairy Co., 592 F.2d 1062 (9th Cir. 1979)
- Moore-Thomas v. Alaska Airlines, Inc., 553 F.3d 1241, 1244 (9th Cir. 2009)
- Mosavi v. Brown, No. LA 15-CV-04147-VAP-AFMkx, 2018 WL 5911761, at *3 (C.D. Cal. Aug. 7, 2018)
- Valdovinos v. County of Los Angeles, No. CV 06-7580 JVS (SHx), 2008 WL 2872648, at *2 (C.D. Cal. July 23, 2008)
- United Fabrics International, Inc. v. J.C. Penney Corp., Inc., No. CV 08-1936-VBF (PJWx), 2009 WL 10675629, at *1 (C.D. Cal. Apr. 23, 2009)
- Channell Commercial Corp. v. Wilmington Machinery, Inc., No. EDCV 14-2240 DMG (DTBx), 2016 WL 7638181, at *4 (C.D. Cal. Mar. 25, 2016)
- Mashiri v. Department of Education, 724 F.3d 1028, 1031 (9th Cir. 2013)
- Hunter v. Philip Morris USA, 582 F.3d 1039, 1043, 1046 (9th Cir. 2009)
- Rangel v. Bridgestone Retail Operations, LLC, 200 F. Supp. 3d 1024, 1030 (C.D. Cal. 2016)
- McCabe v. General Foods Corp., 811 F.2d 1336, 1339 (9th Cir. 1987)
- Hamilton Materials, Inc. v. Dow Chemical Corp., 494 F.3d 1203, 1206 (9th Cir. 2007)
- Grancare, LLC v. Thrower by & through Mills, 889 F.3d 543, 549-52 (9th Cir. 2018)
- Raines v. U.S. Healthworks Medical Group, 15 Cal. 5th 268, 277 (2023)
- Bailey v. San Francisco District Attorney's Office, 16 Cal. 5th 611, 627 (2024)
- Roby v. McKesson Corp., 47 Cal. 4th 686, 705, 709 (2009)

- Martin v. Franklin Capital Corp., 546 U.S. 132, 141 (2005)

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