

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
ILLINOIS

Tyler P. Parrent v. Solvay Fluorides, LLC

Parrent · No. 3:24-cv-01370-GCS · Decided March 17, 2026

SUMMARY

The United States District Court for the Southern District of Illinois denied Solvay Fluorides, LLC’s motion to dismiss Count V of Tyler P. Parrent’s amended complaint. The court held that although the complaint did not adequately allege a religious-accommodation claim because it identified no conflicting employment requirement, it sufficiently pleaded an alternative religious-harassment claim under the Illinois Human Rights Act.

CASE DETAILS

COURT	United States District Court for the Southern District of Illinois
WRITING FOR THE COURT	Gilbert C. Sison
JURISDICTION	United States District Court for the Southern District of Illinois
DECIDED	March 17, 2026
DOCKET	3:24-cv-01370-GCS
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved under Federal Rule of Civil Procedure 12(b)(6) to dismiss Count V of Plaintiff's amended complaint, which asserted religious discrimination, failure to accommodate, and religious harassment under the Illinois Human Rights Act.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts the complaint's allegations as true and determines whether the complaint states a plausible claim for relief. The complaint must provide fair notice and allegations that plausibly suggest entitlement to relief above a speculative level.
PRECEDENTIAL VALUE	Unknown

TOPICS

- religious discrimination
- hostile work environment
- motions to dismiss
- pleadings
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the amended complaint adequately pleaded a religious-accommodation claim under the Illinois Human Rights Act.
2. Whether the amended complaint adequately pleaded an alternative religious-harassment claim under the Illinois Human Rights Act.
3. Whether Federal Rule of Civil Procedure 8 permits Plaintiff to plead religious harassment in the alternative without using explicit either-or language.

HOLDINGS

1. The amended complaint failed to state a religious-accommodation claim because it did not allege an employment requirement that conflicted with Plaintiff's religious observances or practices.
2. The amended complaint stated a viable religious-harassment claim under the IHRA, so Count V could not be dismissed in its entirety.
3. Rule 8 permits alternative pleading when the complaint uses language from which an alternative legal theory can reasonably be inferred; explicit either-or wording is not required.

KEY QUOTATIONS

“Rather, a complaint must use language from which it can be reasonably inferred that there is an alternative pleading.” (at 5)

“Taking the allegations in the Amended Complaint as true, as the Court must at this stage, Plaintiff has stated a viable harassment claim under the IHRA.” (at 6)

FACTUAL BACKGROUND

Plaintiff worked as a technical services specialist for Solvay Fluorides from October 24, 2022, until his termination on October 12, 2023. He observed the Jewish tradition of kashrut and raised his children in the Jewish faith, and he informed Defendant of those religious preferences. Plaintiff alleged that employees questioned and harassed him about his religious beliefs and decisions, including his choice to raise his daughter in the Jewish faith, and emphasized that his religious preferences differed from those of other employees.

PROCEDURAL HISTORY

Plaintiff filed an amended complaint alleging, among other claims, that Solvay Fluorides violated the Illinois Human Rights Act by discriminating against him based on religion. Defendant moved to dismiss Count V for failure to state a claim. The court denied the motion, concluding that the failure-to-accommodate theory was inadequately pleaded but that the complaint sufficiently pleaded an alternative religious-harassment claim.

DISPOSITION

other

CASES CITED

- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555 (2007)
- Pugh v. Tribune Co., 521 F.3d 686, 699 (7th Cir. 2008)
- Ashcroft v. Iqbal, 129 S. Ct. 1937, 1949 (2009)
- Mattice v. Memorial Hospital of South Bend, Inc., 249 F.3d 682, 684 (7th Cir. 2001)
- Volling v. Kurtz Paramedic Services, Inc., 840 F.3d 378, 383 (7th Cir. 2016)
- Rabé v. United Air Lines, Inc., 971 F. Supp. 2d 807, 821 (N.D. Ill. 2013)
- Zaderaka v. Illinois Human Rights Commission, 545 N.E.2d 684, 687 (Ill. 1989)
- Tate v. Dart, 51 F.4th 789, 793 (7th Cir. 2022)
- Adeyeye v. Heartland Sweeteners, LLC, 721 F.3d 444, 449 (7th Cir. 2013)
- Holman v. Indiana, 211 F.3d 399, 407 (7th Cir. 2000)

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