

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
CALIFORNIA

Lewis v. SF Bay Area Rapid Transist District (BART), et al.

Lewis · No. 25-cv-00869-RS · Decided June 27, 2025

SUMMARY

The United States District Court for the Northern District of California granted defendants’ motion to dismiss Gregory S. Lewis’s employment discrimination action against the San Francisco Bay Area Rapid Transit District and individual employees. The court dismissed the ADA and Title VII claims against the individual defendants with prejudice, dismissed the other claims without prejudice, and struck the request for punitive damages against BART. The court granted leave to amend most claims within 30 days.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Richard Seeborg
JURISDICTION	United States District Court for the Northern District of California
DECIDED	June 27, 2025
DOCKET	25-cv-00869-RS
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved under Federal Rule of Civil Procedure 12(b)(6) to dismiss the employment discrimination complaint and under Rule 12(f) to strike the prayer for punitive damages. Plaintiff voluntarily agreed to dismiss the individual defendants and requested leave to amend.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts factual allegations in the complaint as true and construes the pleadings in the light most favorable to the nonmoving party, but considers only the four corners of the complaint and disregards new allegations raised in opposition papers. The complaint must contain sufficient factual matter to state a claim that is plausible on its face.
PRECEDENTIAL VALUE	unpublished, nonprecedential federal district court order

PARTIES

Defendants SF Bay Area Rapid Transit District (BART), Ana Alvarado, and Trent Alvarado v. Gregory S. Lewis

TOPICS

ada discrimination

reasonable accommodation

motions to dismiss

disability definition

damages

PRACTICE AREAS

employment law

civil rights

disability discrimination

civil procedure

remedies

QUESTIONS PRESENTED

1. Whether the ADA and Title VII claims against the individual defendants were subject to dismissal because those statutes do not impose individual-capacity liability on employees.
2. Whether the complaint plausibly alleged claims under the ADEA, GINA, and FLSA when those statutes appeared in the caption but were not supported by factual allegations in the body of the complaint.
3. Whether the complaint plausibly alleged that Lewis had an ADA disability and was a qualified individual able to perform the essential functions of his position with or without reasonable accommodation.
4. Whether the complaint plausibly alleged an actionable failure to engage in the ADA interactive accommodation process.
5. Whether punitive damages could be recovered from BART as a government agency under the ADA and Title VII.

HOLDINGS

1. Employees may not be held individually liable under Title VII or the ADA; the ADA and Title VII claims against Ana Alvarado and Trent Alvarado were dismissed with prejudice.
2. Claims under the ADEA, GINA, and FLSA were dismissed without prejudice because the complaint alleged no facts supporting violations of those statutes.
3. Lewis failed to plausibly allege that he had a disability within the meaning of the ADA.
4. Lewis failed to plausibly allege that he was a qualified individual who could perform the essential functions of a BART electrician with or without reasonable accommodation.
5. There is no stand-alone ADA claim based solely on an employer's failure to engage in the interactive process; a plaintiff must first plausibly plead that he qualifies under the ADA and that an available reasonable accommodation was denied.
6. Punitive damages are unavailable against BART because it is a government agency.

KEY QUOTATIONS

“A Rule 12(b)(6) motion to dismiss addresses the four corners of a complaint, not newly raised allegations or evidence.” (at 3)

“However, because there is no “stand-alone” interactive process claim, Plaintiff must first plead that he “qualifies” under the ADA before he may allege problems with the interactive process.” (at 8)

FACTUAL BACKGROUND

Gregory S. Lewis, a BART electrician, alleged recurring back and leg pain, requested leave and provided BART with medical restrictions. He supplied lists of tasks he claimed he could perform, but alleged that BART determined the tasks did not constitute the essential daily duties of a BART electrician and directed him toward a job search, retirement, voluntary resignation, or medical separation. Lewis alleged that BART did not meaningfully discuss the tasks or his capabilities during the interactive accommodation process, and he later received an EEOC right-to-sue letter before filing suit.

PROCEDURAL HISTORY

Plaintiff filed suit on January 27, 2025, alleging employment-related violations under the ADA, Title VII, FLSA, GINA, and ADEA, although the body of the complaint primarily alleged failure to accommodate under the ADA. Defendants moved to dismiss on May 12, 2025. The court granted the motion, dismissed the ADA and Title VII claims against the individual defendants with prejudice, dismissed the other claims without prejudice, struck the punitive-damages prayer, and granted leave to amend within 30 days.

DISPOSITION

other

CASES CITED

- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555, 570 (2007)
- UMG Recordings, Inc. v. Shelter Capital Partners LLC, 718 F.3d 1006, 1014 (9th Cir. 2013)
- Knievel v. ESPN, 393 F.3d 1068, 1072 (9th Cir. 2005)
- Schneider v. California Department of Corrections, 151 F.3d 1194, 1197 (9th Cir. 1998)
- Ortez v. Washington County, 88 F.3d 804, 808 (9th Cir. 1996)
- Walsh v. Nevada Department of Human Resources, 471 F.3d 1033, 1038 (9th Cir. 2006)
- George v. Bay Area Rapid Transit, 577 F.3d 1005, 1007 (9th Cir. 2009)
- Barnes v. Gorman, 536 U.S. 181, 189 (2002)
- Shields v. Credit One Bank, N.A., 32 F.4th 1218, 1224-25 (9th Cir. 2022)
- Snapp v. United Transportation Union, 889 F.3d 1088, 1095 (9th Cir. 2018)
- Dark v. Curry County, 451 F.3d 1078, 1086 (9th Cir. 2006)
- Barnett v. U.S. Air, Inc., 228 F.3d 1105, 1114-15 (9th Cir. 2000)
- Conley v. Gibson, 355 U.S. 41, 47 (1957)

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