

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
ARKANSAS

Aaron Michael Stricklin v. Amazon.com Services LLC

Stricklin · No. 4:25-cv-401-JM · Decided March 6, 2026

SUMMARY

The United States District Court for the Eastern District of Arkansas grants Amazon.com Services LLC’s partial motion to dismiss an ADA association-discrimination claim brought by former employee Aaron Michael Stricklin. The court holds that EEOC charges may be considered without converting the motion into one for summary judgment and concludes that Stricklin failed to exhaust the association-discrimination claim because his charges addressed only his own disability and accommodation requests. Claim IV of the amended complaint is dismissed with prejudice.

CASE DETAILS

COURT	United States District Court for the Eastern District of Arkansas
WRITING FOR THE COURT	James M. Moody Jr.
JURISDICTION	United States District Court for the Eastern District of Arkansas
DECIDED	March 6, 2026
DOCKET	4:25-cv-401-JM
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendant moved for partial dismissal of Count IV of the amended complaint, which asserted ADA association discrimination. Because Defendant's answer was docketed before its motion to dismiss, Plaintiff argued that the motion should be treated as a motion for judgment on the pleadings. The court treated the distinction as immaterial because the standards are the same and granted the motion.
STANDARD OF REVIEW	A motion for judgment on the pleadings is appropriate when there is no dispute as to any material facts and the moving party is entitled to judgment as a matter of law. Motions under Federal Rule of Civil Procedure 12(b) and 12(c) are reviewed under the same standard. The court may consider public records, documents incorporated by reference, and documents integral to the claim without converting the motion into one for summary judgment.
PRECEDENTIAL VALUE	unknown

TOPICS

ada discrimination

motions to dismiss

motion for judgment on the pleadings

civil procedure

ada / disability

PRACTICE AREAS

employment law

disability discrimination

civil procedure

QUESTIONS PRESENTED

1. Whether the court could consider Stricklin's EEOC charges on a Rule 12 motion without converting the motion into one for summary judgment.
2. Whether Stricklin exhausted an ADA association-discrimination claim when neither EEOC charge alleged discrimination based on his partner's disability.
3. Whether liberal pleading standards for a pro se litigant allowed the unexhausted association-discrimination claim to proceed.

HOLDINGS

1. The court could consider the EEOC charges because they were public records and were incorporated by reference into, and integral to, the amended complaint.
2. Stricklin failed to exhaust his ADA association-discrimination claim because neither EEOC charge alleged that he suffered discrimination because of his partner's disability; the claim was therefore dismissed with prejudice.
3. Liberal pleading standards for pro se litigants did not excuse the failure to exhaust the distinct ADA association-discrimination claim.

KEY QUOTATIONS

“Judgment on the pleadings is appropriate only when there is no dispute as to any material facts and the moving party is entitled to judgment as a matter of law.”

“The law is clear that before a court can review an ADA claim, a claimant must raise each distinct ADA claim in a charge before the EEOC and exhaust available administrative remedies.”

“Nothing in this language notices Defendant of anything other than Stricklin’s charges of discrimination surrounding his own disabilities and requests for accommodations, not his partners.”

FACTUAL BACKGROUND

Stricklin, a former part-time seasonal worker for Amazon, alleged that he was harassed, suspended, discharged, and retaliated against because of his disability and requests for accommodation. His amended complaint additionally asserted that he was discriminated against because of his partner's disability. Neither of his EEOC

charges mentioned discrimination based on his partner's disability; the charges referred only to his own disability, accommodation requests, prior EEOC charge, and federal lawsuit.

PROCEDURAL HISTORY

Stricklin filed a pro se ADA employment-discrimination action on April 25, 2025. The court granted in forma pauperis status, screened the complaint, and served the ADA claims. With leave of court, Stricklin filed an amended complaint on September 29, 2025. Amazon answered and moved to dismiss on November 12, 2025, and the court dismissed Count IV with prejudice.

DISPOSITION

dismissed

CASES CITED

- Natl. Union Fire Ins. Co. of Pittsburgh v. Cargill, Inc., 61 F.4th 615, 619 (8th Cir. 2023)
- Ashley Cnty., Ark. v. Pfizer, Inc., 552 F.3d 659, 665 (8th Cir. 2009)
- Blakely v. Schlumberger Tech. Corp., 648 F.3d 921, 931 (8th Cir. 2011)
- Faibisch v. Univ. of Minn., 304 F.3d 797, 802-03 (8th Cir. 2002)
- Williams v. Emps. Mut. Cas. Co., 845 F.3d 891, 903 (8th Cir. 2017)
- Kale v. Aero Simulation, Inc., 139 F.4th 684, 689-90 (8th Cir. 2025)
- Henson v. Union Pac. R.R. Co., 3 F.4th 1075, 1080 (8th Cir. 2021)
- Parisi v. Boeing Co., 400 F.3d 583, 586 (8th Cir. 2005)