

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MISSOURI, EASTERN DIVISION

Daniel Mellenthin v. Rock Road Equities, LLC

Mellenthin · No. Case No. 4:25-cv-00292-SRC · Decided February 27, 2026

SUMMARY

The United States District Court for the Eastern District of Missouri grants Daniel Mellenthin’s motion for default judgment against Rock Road Equities, LLC in an action alleging violations of the Americans with Disabilities Act. The court orders Rock Road to remove the specified architectural and restroom-accessibility barriers where removal is readily achievable, but declines to order closure of the property. The order also requires Mellenthin to serve the order and judgment on Rock Road and file proof of service.

CASE DETAILS

COURT	United States District Court for the Eastern District of Missouri, Eastern Division
WRITING FOR THE COURT	Stephen R. Clark
JURISDICTION	United States District Court for the Eastern District of Missouri, Eastern Division
DECIDED	February 27, 2026
DOCKET	Case No. 4:25-cv-00292-SRC
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for default judgment and injunctive relief under the Americans with Disabilities Act after the defendant failed to answer or otherwise respond and the Clerk entered default.
STANDARD OF REVIEW	Default judgment is committed to the sound discretion of the district court. Before entering default judgment, the court must review the sufficiency of the complaint and determine whether the well-pleaded facts constitute a legitimate cause of action.
PRECEDENTIAL VALUE	Unknown

TOPICS

- default judgment
- architectural barriers
- ada / disability
- injunctions
- civil procedure

PRACTICE AREAS

Civil procedure

Americans with Disabilities Act

Disability-access litigation

Federal remedies

QUESTIONS PRESENTED

1. Whether the court should enter default judgment after Rock Road failed to plead or otherwise defend.
2. Whether Mellenthin's well-pleaded allegations established an ADA violation warranting injunctive relief.
3. Whether the requested injunction should require removal of the alleged barriers only where removal is readily achievable.
4. Whether the court should order closure of the property until the barriers were removed.

HOLDINGS

1. A default judgment may be entered after the Clerk has entered default when the complaint's well-pleaded factual allegations, taken as true, establish a legitimate cause of action; default does not admit legal conclusions.
2. The well-pleaded allegations that Rock Road's property contained specified architectural and accessibility barriers established an ADA violation sufficient to support injunctive relief under 42 U.S.C. § 12188(a).
3. Rock Road must remove the specified barriers only where removal is readily achievable, meaning easily accomplishable and capable of being carried out without much difficulty or expense.
4. The court declined to order closure of the property pending removal of the alleged barriers.

KEY QUOTATIONS

“Default judgments are disfavored in the law, and before granting one, a court should satisfy itself that the moving party is entitled to judgment by reviewing the sufficiency of the complaint and the substantive merits of the plaintiff’s claim.”

“While courts deem all well-pleaded facts admitted upon default, “it remains for the [district] court to consider whether the unchallenged facts constitute a legitimate cause of action, since a party in default does not admit mere conclusions of law.””

FACTUAL BACKGROUND

Mellenthin alleged that Rock Road's property contained numerous architectural and accessibility barriers affecting parking spaces, accessible routes, entrances, and restroom facilities. He sought injunctive relief under the ADA. Rock Road did not answer or otherwise defend after service, resulting in entry of default.

PROCEDURAL HISTORY

Mellenthin filed an ADA action in March 2025 and served Rock Road on July 21, 2025. Rock Road failed to plead or otherwise defend, and the Clerk entered default on September 11, 2025. The district court granted

Mellenthin's motion for default judgment and injunctive relief, but declined to order closure of the property; it directed service of the order and judgment and proof of service.

DISPOSITION

other

CASES CITED

- United States ex rel. Time Equip. Rental & Sales, Inc. v. Harre, 983 F.2d 128, 130 (8th Cir. 1993)
- Monsanto v. Hargrove, Case No. 4:09-cv-1628-CEJ, 2011 WL 5330674, at *1 (E.D. Mo. Nov. 7, 2011)
- Marshall v. Baggett, 616 F.3d 849, 852 (8th Cir. 2010)
- Thomson v. Wooster, 114 U.S. 104 (1885)
- FTC v. Packers Brand Meats, Inc., 562 F.2d 9, 10 (8th Cir. 1977) (per curiam)
- Murray v. Lene, 595 F.3d 868, 871 (8th Cir. 2010)
- Childress v. Fox Assocs., LLC, 932 F.3d 1165, 1171 (8th Cir. 2019)
- Gorman v. Bartch, 152 F.3d 907, 912 (8th Cir. 1998)
- Midwest Disability Initiative v. JANS Enters., Inc., 929 F.3d 603, 606 (8th Cir. 2019)
- Disability Support All. v. Heartwood Enters., LLC, 885 F.3d 543, 546 (8th Cir. 2018)
- Smith v. Hartmann's Moonshine Shoppe, LLC, No. 17-cv-4211, 2019 WL 4888996, at *3 (D. Minn. Oct. 3, 2019)
- Davis v. Anthony, Inc., 886 F.3d 674, 676 n.2 (8th Cir. 2018)
- Loskot v. Mathews, No. 2:09-cv-00011, 2010 WL 1173053, at *2 (E.D. Cal. Mar. 23, 2010)