

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
OHIO

Joseph R. Maas, et al. v. JTM Provisions Company, Inc., et al.

Maas · No. 1:23-cv-76 · Decided January 21, 2026

SUMMARY

The United States District Court for the Southern District of Ohio grants Plaintiff Joseph R. Maas’s motion for reconsideration and supplements its prior opinion regarding available relief on his mixed-motive Title VII religious discrimination claim. The Court clarifies that if the employer proves it would have taken the same action absent discrimination, the plaintiff is limited to declaratory and limited injunctive relief and attorney fees and costs; otherwise, damages may be available.

CASE DETAILS

COURT	United States District Court for the Southern District of Ohio
WRITING FOR THE COURT	Jeffery P. Hopkins
JURISDICTION	United States District Court for the Southern District of Ohio
DECIDED	January 21, 2026
DOCKET	1:23-cv-76
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff Joseph R. Maas moved for reconsideration of the court's prior Opinion and Order concerning the relief available on his mixed-motive Title VII religious-discrimination claim.
STANDARD OF REVIEW	The order applies the statutory mixed-motive framework under Title VII; no separate standard of review for reconsideration is stated.
PRECEDENTIAL VALUE	Unpublished federal district court order; persuasive rather than binding outside the case.
PARTIES	Joseph R. Maas, et al. v. JTM Provisions Company, Inc., et al.

TOPICS

- title vii
- religious discrimination
- employment discrimination
- motion for reconsideration
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. What relief is available on a mixed-motive Title VII religious-discrimination claim if the employer proves that it would have taken the same employment action absent the impermissible motivating factor?
2. Whether the court's prior Opinion and Order required clarification concerning the availability of compensatory damages, reinstatement, and back pay.

HOLDINGS

1. If the employer proves by a preponderance of the evidence that it would have taken the same employment action in the absence of the impermissible motivating factor, the plaintiff is limited to declaratory relief, limited injunctive relief, and attorney fees and costs, and is not entitled to compensatory damages, reinstatement, or back pay.
2. The plaintiff is entitled to damages if the employer does not prove by a preponderance of the evidence that it would have taken the same action even if the plaintiff's religious nonconformity had played no role in the discharge decision.

KEY QUOTATIONS

“if, at trial, JTM “proves by a preponderance of the evidence that it would have taken the same action regardless of discrimination, then the plaintiff is entitled only to declaratory relief, limited injunctive relief, and attorneys’ fees — but not to compensatory damages, reinstatement, or back pay.”” (Order)

“Conversely, Joe is entitled to damages if JTM does not prove, by a preponderance of the evidence, that JTM would have treated him similarly even if Joe’s religious non-conformity had played no role in the decision to discharge him.” (Order)

FACTUAL BACKGROUND

Joseph R. Maas alleged that JTM Provisions discharged him because of his religious nonconformity, asserting a mixed-motive Title VII religious-discrimination claim. The court addressed the relief available if JTM proved that it would have discharged or treated Maas the same way absent the impermissible religious motive. The order clarified that damages remain available unless JTM proves that it would have taken the same action regardless of discrimination.

PROCEDURAL HISTORY

The court previously issued an Opinion and Order addressing the mixed-motive Title VII claim. Maas moved for reconsideration, asserting that the prior order did not accurately state the scope of relief available if the employer failed to prove that it would have taken the same action absent the impermissible motivating factor. The court granted reconsideration and supplemented its prior order.

DISPOSITION

other

CASES CITED

- *Spees v. James Marine, Inc.*, 617 F.3d 380, 390 (6th Cir. 2010)
- *Nuskey v. Hochberg*, 730 F. Supp. 2d 1, 3 n.1 (D.D.C. 2010)
- *Desert Palace, Inc. v. Costa*, 539 U.S. 90, 96-97 (2003)
- *Wright v. Murray Guard, Inc.*, 455 F.3d 702, 711-12 (6th Cir. 2006)

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