

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK

Wiggins v. People Inc.

Wiggins · No. 21-CV-77-LJV · Decided June 9, 2026

SUMMARY

The United States District Court for the Western District of New York grants People Inc.’s motion for summary judgment in Jimeen Wiggins’s ADA employment-discrimination action. The court discusses res judicata and New York’s election-of-remedies doctrine, but declines to resolve the unsettled preclusion issue and reaches the merits. It concludes that Wiggins’s requested accommodation would eliminate essential job functions and that she failed to rebut the employer’s legitimate, nondiscriminatory reasons for the challenged employment actions.

CASE DETAILS

COURT	United States District Court for the Western District of New York
WRITING FOR THE COURT	Lawrence J. Vilardo
JURISDICTION	United States District Court for the Western District of New York
DECIDED	June 9, 2026
DOCKET	21-CV-77-LJV
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved for summary judgment on the plaintiff’s ADA and FMLA claims, principally arguing res judicata and failure on the merits. The plaintiff also moved for release of finances and to close the case.
STANDARD OF REVIEW	Summary judgment is appropriate under Federal Rule of Civil Procedure 56 when there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The evidence is viewed in the light most favorable to the nonmoving party, with reasonable inferences drawn in that party’s favor, but conclusory statements, conjecture, and speculation do not create a genuine issue for trial.
PRECEDENTIAL VALUE	Unpublished federal district court decision; precedential status is unknown from the source.

PARTIES

Jimeen Wiggins v. People Inc.

TOPICS

summary judgment

res judicata

ada / disability

disability discrimination

wrongful termination

PRACTICE AREAS

civil procedure

employment law

employment discrimination

disability discrimination

civil rights

QUESTIONS PRESENTED

1. Whether res judicata barred Wiggins's federal ADA claims based on the prior New York state court dismissal.
2. Whether People Inc. was entitled to summary judgment on Wiggins's ADA reasonable-accommodation claim because the requested accommodation would eliminate or interfere with essential job functions.
3. Whether Wiggins presented sufficient evidence that her disability, accommodation request, or protected activity was the but-for cause of her termination or retaliation.
4. Whether Wiggins's FMLA claim was barred by the applicable two- or three-year statute of limitations.

HOLDINGS

1. The court declined to apply res judicata because it viewed the preclusive effect of a dismissal with prejudice under New York's election-of-remedies doctrine as an unsettled and close legal question. The court nevertheless proceeded to the merits and held that the claims failed there.
2. People Inc. was entitled to summary judgment on the reasonable-accommodation claim because Wiggins did not present evidence rebutting the employer's showing that limiting her standing to thirty minutes at a time would prevent her from performing essential functions of the primary-instructor position.
3. People Inc. was entitled to summary judgment on Wiggins's wrongful-termination and retaliation theories because she failed to produce evidence from which a reasonable jury could find that her disability or accommodation request was the but-for cause of her termination.
4. The FMLA claim was time-barred because Wiggins commenced the action more than five years after the alleged violation, exceeding both the ordinary two-year limitations period and the three-year period for willful violations.

KEY QUOTATIONS

“A dismissal ‘with prejudice’ generally signifies that the court intended to dismiss the action ‘on the merits,’ that is, to bring the action to a final conclusion against the plaintiff.” (Discussion I.B.2)

“A reasonable accommodation can never involve the elimination of an essential function of a job.” (Discussion II.A.1)

“For all those reasons, this Court GRANTS People Inc.’s motion for summary judgment.” (Conclusion)

FACTUAL BACKGROUND

Wiggins worked for People Inc. as a primary instructor and alleged that the company failed to accommodate disabilities affecting her foot and mental health before placing her on unpaid administrative leave and terminating her employment. She requested an accommodation limiting standing to no more than thirty minutes at a time. People Inc. presented evidence that the position required standing, lifting and transferring clients, monitoring client needs, and responding to emergencies, as well as evidence that Wiggins had been investigated for mistreating a client and had recurring attendance problems. Wiggins had previously pursued discrimination claims before the New York State Division of Human Rights, which dismissed them after a hearing, and a New York state court later dismissed her petition with prejudice.

PROCEDURAL HISTORY

Wiggins filed an ADA action in federal court on January 15, 2021, and later filed an amended complaint with limited assistance from appointed pro bono counsel. People Inc. moved for summary judgment in July 2022. The court granted the motion, denied Wiggins's ancillary motions as moot, directed entry of judgment, and closed the case.

DISPOSITION

other

CASES CITED

- Collazo v. Pagano, 656 F.3d 131, 134 (2d Cir. 2011)
- Bank of N.Y. v. First Millennium, Inc., 607 F.3d 905, 918 (2d Cir. 2010)
- Monahan v. N.Y.C. Dep't of Corrs., 214 F.3d 275, 284-85 (2d Cir. 2000)
- United States v. E. River Hous. Corp., 90 F. Supp. 3d 118, 141 (S.D.N.Y. 2015)
- Joseph v. Athanasopoulos, 648 F.3d 58, 61-62 (2d Cir. 2011)
- McKithen v. Brown, 481 F.3d 89, 104 (2d Cir. 2007)
- Russo v. City of New York, 705 F. App'x 38, 39 (2d Cir. 2017)
- Dekom v. Fannie Mae, 846 F. App'x 14, 19 (2d Cir. 2021)
- Woods v. Dunlop Tire Corp., 972 F.2d 36, 40-41 (2d Cir. 1992)
- Barnes v. Royal Health Care LLC, 357 F. App'x 375, 377 (2d Cir. 2009)
- Troeger v. Ellenville Cent. Sch. Dist., 2016 WL 5107119, at *7 (N.D.N.Y. Sept. 20, 2016)
- Hanrahan v. Riverhead Nursing Home, 592 F.3d 367, 369 (2d Cir. 2010)
- Martin v. N.Y. State Dep't of Mental Hygiene, 588 F.2d 371, 373 n.3 (2d Cir. 1978)
- Wiercinski v. Mangia 57, Inc., 2010 WL 2681168, at *2 (E.D.N.Y. July 2, 2010)
- Universal Packaging Corp. v. N.Y. State Div. of Hum. Rts., 270 A.D.2d 586, 587, 704 N.Y.S.2d 332, 333 (3d Dep't 2000)
- Legg v. Eastman Kodak Co., 248 A.D.2d 936, 937, 670 N.Y.S.2d 291, 292 (4th Dep't 1998)
- Benjamin v. N.Y. City Dep't of Health, 2007 WL 3226958, at *5 (Sup. Ct. N.Y. Cnty. Oct. 23, 2007)

- *Guerrero Toro v. NorthStar Demolition & Remediation*, 366 F. Supp. 3d 449, 474-75 (W.D.N.Y. 2019)
- *Kirkland v. City of Peekskill*, 828 F.2d 104, 109 (2d Cir. 1987)
- *Yonkers Contracting Co., Inc. v. Port Auth. Trans-Hudson Corp.*, 93 N.Y.2d 375, 380, 712 N.E.2d 678, 681 (1999)
- *Higgins v. NYP Holdings, Inc.*, 836 F. Supp. 2d 182, 187 (S.D.N.Y. 2011)
- *Byrd v. Town of DeWitt*, 698 F. Supp. 3d 379, 390, 393, 395 (N.D.N.Y. 2023)
- *Kassenoff v. Kassenoff*, 2023 WL 2648844, at *4 (S.D.N.Y. Mar. 27, 2023)
- *Bray v. New York Life Ins.*, 851 F.2d 60, 64 (2d Cir. 1988)
- *Insurance Corp. of Ireland, Ltd. v. Compagnie des Bauxites de Guinee*, 456 U.S. 694, 702 n.9 (1982)
- *King v. N.Y.C. Emps.' Ret. Sys.*, 2015 WL 4718004, at *22 (E.D.N.Y. Aug. 10, 2015)
- *Celotex Corp. v. Catrett*, 477 U.S. 317, 322-24 (1986)
- *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 248, 256 (1986)
- *Goenaga v. March of Dimes Birth Defects Found.*, 51 F.3d 14, 18 (2d Cir. 1995)
- *Matsushita Elec. Indus. Co. v. Zenith Radio Corp.*, 475 U.S. 574, 586-87 (1986)
- *Abdu-Brisson v. Delta Air Lines, Inc.*, 239 F.3d 456, 465-66 (2d Cir. 2001)
- *Kulak v. City of New York*, 88 F.3d 63, 71 (2d Cir. 1996)
- *Davis-Bell v. Columbia Univ.*, 851 F. Supp. 2d 650, 675-76 (S.D.N.Y. 2012)
- *Thompson v. N.Y.C. Dep't of Prob.*, 348 F. App'x 643, 645 (2d Cir. 2009)
- *Reg'l Econ. Comm. Action Program, Inc. v. City of Middletown*, 294 F.3d 35, 48-49 (2d Cir. 2002)
- *Ryan v. Grae & Rybicki, P.C.*, 135 F.3d 867, 869-70 (2d Cir. 1998)
- *Shannon v. N.Y.C. Transit Auth.*, 332 F.3d 95, 100 (2d Cir. 2003)
- *Ghent v. Moore*, 324 F. App'x 55, 57 (2d Cir. 2009)
- *Stern v. Trs. of Columbia Univ. in City of N.Y.*, 131 F.3d 305, 315 (2d Cir. 1997)
- *Porter v. N.Y. Univ. Sch. of L.*, 392 F.3d 530, 531 (2d Cir. 2004)
- *Coppedge v. United States*, 369 U.S. 438 (1962)