

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK

Adelaida Martinez v. Staten Island University Hospital; Karyn Treval, In Her Individual and Official Capacities; and Antoinette Henderson, In Her Individual and Official Capacities

Martinez · No. 19-cv-2672 (NRM) (MMH) · Decided January 6, 2026

SUMMARY

The opinion addresses cross-motions for summary judgment in Adelaida Martinez’s claims against Staten Island University Hospital and former supervisors arising from her termination after a workplace incident. The court found genuine disputes of material fact concerning the nature of Martinez’s conduct, the hospital’s knowledge of her disabilities, and whether her conduct was disability-related, precluding summary judgment on her disability discrimination claims. The court rejected or granted summary judgment against her retaliation, FMLA interference, and LMRA hybrid claims, while denying Martinez’s motion in full and granting defendants’ motion in part.

CASE DETAILS

COURT	United States District Court for the Eastern District of New York
WRITING FOR THE COURT	Nina R. Morrison
JURISDICTION	United States District Court for the Eastern District of New York
DECIDED	January 6, 2026
DOCKET	19-cv-2672 (NRM) (MMH)
DISPOSITION	other
PROCEDURAL POSTURE	Cross-motions for summary judgment in an employment-discrimination, leave-interference, and labor-law action arising from Plaintiff's termination.
STANDARD OF REVIEW	Summary judgment is appropriate when the movant shows that there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law. The court viewed the record in the light most favorable to the party opposing summary judgment, resolved ambiguities and drew factual inferences in that party's favor, and required the nonmovant to identify specific facts showing a genuine issue for trial.

PRECEDENTIAL VALUE	unpublished district court opinion; persuasive only
PARTIES	Adelaida Martinez v. Staten Island University Hospital, Karyn Treval, Antoinette Henderson

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QUESTIONS PRESENTED

1. Whether genuine disputes of material fact precluded summary judgment on Martinez's ADA, NYSHRL, and NYCHRL disability-discrimination claims under adverse-employment-action and failure-to-accommodate theories.
2. Whether genuine disputes of material fact precluded summary judgment on Martinez's NYCHRL disability-discrimination claims against Treval and Henderson individually.
3. Whether Martinez established a prima facie retaliation claim under the ADA, NYSHRL, or NYCHRL based on protected activity before her termination.
4. Whether Martinez's NYSHRL and NYCHRL aider-and-abettor claims against Treval and Henderson survived summary judgment.
5. Whether Martinez's NYCHRL vicarious-liability claim against SIUH was duplicative of her direct NYCHRL discrimination claim.
6. Whether Martinez established FMLA interference when she did not request FMLA leave or provide sufficient notice of an FMLA-qualifying need before termination.
7. Whether Martinez established the union-breach-of-duty-of-fair-representation element of a hybrid LMRA § 301 claim.

HOLDINGS

1. Summary judgment was inappropriate because disputed facts existed regarding the nature of Martinez's conduct, whether it constituted workplace violence or other misconduct warranting termination, whether the conduct was caused by her disability, and whether defendants knew of the disability and its connection to the conduct.
2. Summary judgment was inappropriate on Martinez's failure-to-accommodate claims because disputed facts existed regarding defendants' notice of her disability, whether she was qualified with reasonable accommodation, whether the disability was obvious enough to trigger an interactive process, and whether the employer failed to consider an accommodation.

3. Both parties' summary-judgment motions were denied on the NYCHRL direct-liability claims against Treval and Henderson because disputed facts existed regarding their supervisory roles, knowledge of Martinez's disability, and participation in the termination decision.
4. Defendants were entitled to summary judgment on all retaliation claims because Martinez did not engage in protected activity before the decision to terminate her employment.
5. Neither side was entitled to summary judgment on the aider-and-abettor claims against Treval and Henderson because the underlying discrimination claims survived and disputed facts existed regarding the individuals' participation in the termination decision.
6. The NYCHRL vicarious-liability claim against SIUH was dismissed as duplicative because Martinez also asserted a direct NYCHRL discrimination claim against SIUH based on the same conduct.
7. Defendants were entitled to summary judgment on the FMLA-interference claim because Martinez did not request FMLA leave or provide sufficient notice of an intent to take FMLA leave before termination; earlier alleged denials were time-barred.
8. Defendants were entitled to summary judgment on Martinez's hybrid LMRA claim because she failed to show that the Union breached its duty of fair representation.

KEY QUOTATIONS

“At trial, Martinez will be permitted to advance both an adverse employment action theory and a failure-to-accommodate theory of liability as to her disability discrimination claims under the ADA, NYSHRL, and NYCHRL.” (Conclusion)

FACTUAL BACKGROUND

Martinez worked for Staten Island University Hospital as an emergency-department technician and had a documented history of anxiety, PTSD, panic attacks, and intermittent FMLA leave. On November 7, 2018, after becoming distressed while preparing a pediatric emergency room, Martinez experienced an incident in a nurses' lounge; the parties disputed whether she screamed, cursed, struck objects, and engaged in workplace violence or instead suffered a panic attack without threatening anyone. She was suspended and terminated on November 14, 2018, and the hospital relied on its workplace-violence policies. The record also disputed whether hospital decisionmakers knew of Martinez's disabilities and whether the incident was caused by them.

PROCEDURAL HISTORY

Martinez filed suit on May 6, 2019, later filing amended complaints asserting claims under the ADA, FMLA, NYSHRL, NYCHRL, and LMRA § 301. The Union was initially a defendant, but the claims against it were dismissed with prejudice by stipulation in 2022. After discovery, Martinez moved for partial summary judgment and the remaining defendants moved for summary judgment on all claims. The court denied Martinez's motion in its entirety, granted defendants' motion on the retaliation, FMLA-interference, LMRA hybrid, and NYCHRL vicarious-liability claims, and denied it on the disability-discrimination, NYCHRL individual-liability, and NYCHRL aider-and-abettor claims.

DISPOSITION

CASES CITED

- Beyer v. County of Nassau, 524 F.3d 160, 163 (2d Cir. 2008)
- Guilbert v. Gardner, 480 F.3d 140, 145 (2d Cir. 2007)
- SCW W. LLC v. Westport Ins. Corp., 856 F. Supp. 2d 514, 521 (E.D.N.Y. 2012)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248 (1986)
- NetJets Aviation, Inc. v. LHC Communications, LLC, 537 F.3d 168, 178 (2d Cir. 2008)
- Celotex Corp. v. Catrett, 477 U.S. 317, 323 (1986)
- Valentine v. Standard & Poor's, 50 F. Supp. 2d 262, 289 (S.D.N.Y. 1999), *aff'd*, 205 F.3d 1327 (2d Cir. 2000)
- McMillan v. City of New York, 711 F.3d 120, 125-29 (2d Cir. 2013)
- McDonnell Douglas Corp. v. Green, 411 U.S. 792 (1973)
- Sista v. CDC Ixis N. Am., Inc., 445 F.3d 161, 169 (2d Cir. 2006)
- Brady v. Wal-Mart Stores, Inc., 531 F.3d 127, 135-36 (2d Cir. 2008)
- McElwee v. County of Orange, 700 F.3d 635, 641-43 (2d Cir. 2012)
- Tafolla v. Heilig, 80 F.4th 111, 122, 125-26 (2d Cir. 2023)
- Russell v. NYU, 246 N.E.3d 868, 877 (N.Y. 2024)
- Goffe v. NYU Hosp. Ctr., 201 F. Supp. 3d 337, 358 (E.D.N.Y. 2016)
- Natofsky v. City of New York, 921 F.3d 337, 353-54 (2d Cir. 2019)
- Lucio v. New York City Department of Education, 575 F. App'x 3, 6 (2d Cir. 2014)
- Witchard v. Montefiore Medical Center, 960 N.Y.S.2d 402, 403-04 (N.Y. App. Div. 1st Dep't 2013)
- Graziadio v. Culinary Institute of America, 817 F.3d 415, 424 (2d Cir. 2016)
- Potenza v. City of New York, 365 F.3d 165, 167-68 (2d Cir. 2004)
- White v. White Rose Food, 237 F.3d 174, 178-83 (2d Cir. 2001)
- Vaughn v. Air Line Pilots Association, International, 604 F.3d 703, 709-10 (2d Cir. 2010)
- Air Line Pilots Ass'n, Int'l v. O'Neill, 499 U.S. 65, 67 (1991)
- Roy v. Buffalo Philharmonic Orchestra Society, Inc., 682 F. App'x 42, 46-47 (2d Cir. 2017)
- DelCostello v. International Brotherhood of Teamsters, 462 U.S. 151, 163-65 (1983)
- Vaca v. Sipes, 386 U.S. 171, 194 (1967)
- Arnold v. 1199 SEIU, No. 09-CV-5576 (DLC), 2009 WL 4823906, at *3 (S.D.N.Y. Dec. 15, 2009), *aff'd*, 420 F. App'x 48 (2d Cir. 2011)