

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
INDIANA

LaCrese C. Smith v. Ron Neal, et al.

LaCrese C. Smith v. Ron Neal, No. 3:25-CV-376-CCB-SJF (N.D. Ind. Jan. 16, 2026) · No. 3:25-CV-376-CCB-SJF · Decided January 16, 2026

SUMMARY

The court granted defendants’ Rule 12(b)(6) motion to dismiss LaCrese Smith’s Title VII employment discrimination, retaliation, and race- and gender-discrimination claims. The court held that Smith alleged, at most, that the defendants were supervisors, not employers or joint employers, and that individual supervisors are not liable under Title VII. The court denied Smith’s additional motions, including motions for default judgment, sanctions, and leave to add a 42 U.S.C. § 1983 claim, and directed the clerk to close the case.

CASE DETAILS

COURT	United States District Court for the Northern District of Indiana
WRITING FOR THE COURT	Cristal C. Brisco
JURISDICTION	United States District Court for the Northern District of Indiana
DECIDED	January 16, 2026
DOCKET	3:25-CV-376-CCB-SJF
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff brought a Title VII employment-discrimination action against Ron Neal and other defendants. Defendants moved to dismiss under Federal Rule of Civil Procedure 12(b)(6). The court also considered plaintiff's subsequent motions, including requests to amend, default judgment, sanctions, and relief under 42 U.S.C. § 1983.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded factual allegations as true and asks whether the complaint contains sufficient factual matter to state a plausible claim for relief. Formulaic recitations of elements and conclusory allegations are insufficient.
PRECEDENTIAL VALUE	Unknown; district court opinion with no reported citation identified

TOPICS

- employment discrimination
- title vii
- motions to dismiss
- default judgment
- civil procedure

PRACTICE AREAS

employment discrimination

title vii

civil rights

civil procedure

QUESTIONS PRESENTED

1. Whether Smith's Title VII claims against the individual defendants stated a plausible claim when her complaint identified the Indiana State Prison as her employer and alleged no facts establishing that the defendants were her employers or joint employers.
2. Whether Smith's timely motion asserting a joint-employer relationship could be construed as an amendment and, if so, whether the proposed amendment would cure the pleading defect.
3. Whether Smith was entitled to default judgment or other relief because she allegedly did not receive service by mail of defendants' response and notice of attorney withdrawal.
4. Whether Smith could add a 42 U.S.C. § 1983 claim through a later motion or response to the motion to dismiss.

HOLDINGS

1. The complaint failed to state a Title VII claim against the individual defendants because it did not allege that they were Smith's employers or joint employers, and Title VII does not authorize individual-capacity suits against supervisors.
2. Even if Smith's timely motion were construed as an amendment as a matter of course, the amendment would be futile because its allegation that defendants exercised significant control over her work was conclusory and established, at most, a supervisory relationship.
3. Smith was not entitled to default judgment because defendants had appeared and defended, and failure to receive a filing by mail did not establish the extreme circumstances required for default judgment.
4. Smith could not add a § 1983 claim through a response or later motion, and the proposed amendment would be futile because she alleged only a conclusory assertion that defendants acted under color of law without facts supporting a plausible § 1983 claim.

KEY QUOTATIONS

“To survive a motion to dismiss under Rule 12(b)(6), “a complaint must contain ‘sufficient factual matter, accepted as true, to state a claim to relief that is plausible on its face.’””

“Title VII does not authorize suit against individual supervisors.”

“Default is a “drastic sanction” that should only “be used in extreme situations.””

“As Ms. Smith’s § 1983 claim was not present in her complaint, and she is not entitled to amend her complaint in her response to the motion to dismiss, the only sustainable interpretation of this motion is that Ms. Smith is seeking leave to amend her complaint by adding a § 1983 claim.”

FACTUAL BACKGROUND

Smith was formerly employed by the Indiana State Prison and served on its Disciplinary Hearing Board. After conducting a disciplinary hearing and finding the subject individual not guilty, she alleged that she was criticized, unofficially demoted, and later reassigned after returning from leave following a miscarriage. She alleged race- and gender-based discrimination, retaliation, unequal employment terms and conditions, and hostile conduct, but identified the Indiana State Prison as her employer and alleged no facts showing that the individual defendants shared employer status with the prison. She later received an EEOC right-to-sue letter and filed this action.

PROCEDURAL HISTORY

LaCrese Smith filed a Title VII complaint after the Indiana Civil Rights Commission referred her complaint to the EEOC and the EEOC issued a right-to-sue letter. Defendants moved to dismiss for failure to state a claim. The court construed one timely pro se filing as Smith's response and considered several later motions, but granted the motion to dismiss, denied the remaining motions, and directed the clerk to close the case.

DISPOSITION

dismissed

CASES CITED

- *Ebmeyer v. Brock*, 11 F.4th 537, 542 n.4 (7th Cir. 2021)
- *Erickson v. Pardus*, 551 U.S. 89, 94 (2007)
- *Anderson v. Hardman*, 241 F.3d 544, 545 (7th Cir. 2001)
- *Members v. Paige*, 140 F.3d 699, 702 (7th Cir. 1998)
- *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009)
- *Bell Atlantic Corp. v. Twombly*, 550 U.S. 554, 557, 570 (2007)
- *McCauley v. City of Chicago*, 671 F.3d 611, 616 (7th Cir. 2011)
- *E.E.O.C. v. Concentra Health Services, Inc.*, 496 F.3d 773, 776 (7th Cir. 2007)
- *Toran v. Bzdawka*, 72 F. App'x 457, 461 (7th Cir. 2003)
- *Gastineau v. Fleet Mortgage Corp.*, 137 F.3d 490, 494 (7th Cir. 1998)
- *Love v. JP Cullen & Sons*, 779 F.3d 697, 701-02 (7th Cir. 2015)
- *Williams v. Banning*, 72 F.3d 552, 555 (7th Cir. 1995)
- *Sattar v. Motorola Inc.*, 138 F.3d 1164, 1168 (7th Cir. 1998)
- *Brenston v. Wal-Mart*, 2009 WL 1606935, at *3 (N.D. Ind. June 8, 2009)
- *Sun v. Board of Trustees*, 473 F.3d 799, 811 (7th Cir. 2007)
- *Stoller v. Berkshire Hathaway*, 2018 WL 10419769, at *1 n.1 (N.D. Ill. Feb. 7, 2018)
- *Pirelli Armstrong Tire Corp. Medical Benefits Trust v. Walgreen Co.*, 631 F.3d 436, 448 (7th Cir. 2011)