

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Renteria v. Land O'Lakes, Inc.

No. 1:25-cv-00043 JLT SAB (E.D. Cal. June 12, 2025) · No. 1:25-cv-00043 JLT SAB · Decided June 12, 2025

SUMMARY

The United States District Court for the Eastern District of California adopted the magistrate judge’s findings and recommendations concerning Iris Renteria’s motion to remand. The court concluded that the requested injunction concerning employee non-solicitation provisions was not public injunctive relief and that Plaintiff had not otherwise established Article III standing. The court granted remand to Tulare County Superior Court, denied Defendant’s motion to dismiss as moot, and ordered the case closed.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Charis E. Turner
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	June 12, 2025
DOCKET	1:25-cv-00043 JLT SAB
DISPOSITION	remanded
PROCEDURAL POSTURE	The district court conducted de novo review of a magistrate judge's findings and recommendations concerning Plaintiff's motion to remand and adopted those findings and recommendations in full.
STANDARD OF REVIEW	De novo review under 28 U.S.C. § 636(b)(1)(C) of the magistrate judge's findings and recommendations to which objections were filed.
PRECEDENTIAL VALUE	Unknown; unpublished federal district court order.

TOPICS

- standing
- injunctions
- noncompete agreements
- employment contracts
- civil procedure

PRACTICE AREAS

- civil procedure
- employment law
- remedies

QUESTIONS PRESENTED

1. Whether Plaintiff's requested injunction constituted public injunctive relief.
2. Whether Plaintiff adequately alleged Article III standing to maintain the action in federal court.
3. Whether the magistrate judge's findings and recommendations granting remand should be adopted after de novo review.

HOLDINGS

1. An injunction requiring Defendant to notify current and former employees that non-solicitation provisions are void and prohibiting Defendant from enforcing those provisions against employees does not constitute public injunctive relief when any benefit to the general public is merely incidental to the direct benefit received by affected employees.
2. Plaintiff did not otherwise allege Article III standing for her claim seeking injunctive relief, requiring remand of the action to state court.

KEY QUOTATIONS

“That the general public may incidentally benefit from enjoining Defendant from enforcing its non-solicitation provision against its former and current employees is insufficient to classify such relief as public injunctive relief.” (Doc. 27 at 10-11)

“The findings and recommendations (Doc. 27) dated May 12, 2025, are ADOPTED in full.” (Order at 1-2)

FACTUAL BACKGROUND

Plaintiff challenged non-solicitation provisions in the employment contracts of Defendant's current and former California employees. She sought an injunction requiring Defendant to notify affected employees that the provisions were void and prohibiting Defendant from including or enforcing similar provisions in the future. Plaintiff characterized the requested relief as a public injunction benefiting the California public, while the court concluded that any public benefit was merely incidental to the benefit received by employees whose contracts contained the provisions.

PROCEDURAL HISTORY

Defendant removed the action from Tulare County Superior Court and moved to dismiss under Federal Rule of Civil Procedure 12(b)(6). Plaintiff moved to remand, arguing that she lacked Article III standing because her sole claim sought public injunctive relief rather than relief for an individual injury. The magistrate judge recommended remand because Plaintiff failed to allege Article III standing. After reviewing Plaintiff's objections and Defendant's response de novo, the district court adopted the recommendations, granted remand, denied the motion to dismiss as moot, and closed the case.

DISPOSITION

remanded

REMAND INSTRUCTIONS

The action was remanded to the Tulare County Superior Court. The Clerk was directed to close the federal case.

CASES CITED

- Rogers v. Lyft, Inc., 452 F. Supp. 3d 904, 921 (N.D. Cal. 2020)
- Clifford v. Quest Software Inc., 38 Cal. App. 5th 745, 754-55 (2019)
- National Collegiate Athletic Ass'n v. Alston, 594 U.S. 69, 93 (2021)
- Valladolid v. Pacific Operations Offshore, LLP, 604 F.3d 1126, 1131 (9th Cir. 2010), aff'd and remanded sub nom. Pacific Operators Offshore, LLP v. Valladolid, 565 U.S. 207 (2012)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/federal/united-states-district-court-for-the-eastern-district-of-cal/2025/renteria-v-land-o-lakes-inc-s25yvrq0>