

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Hogan v. Childrens Guild Alliance

Hogan · No. Civil Action No. 2024-3057 (JMC) · Decided March 19, 2026

SUMMARY

The United States District Court for the District of Columbia grants Tiairra Hogan, proceeding pro se, leave to amend her Title VII discrimination and retaliation complaint. The court denies the defendant's motion to dismiss as moot and orders Hogan to file an amended complaint by May 4, 2026.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Jia M. Cobb
JURISDICTION	United States District Court for the District of Columbia
DECIDED	March 19, 2026
DOCKET	Civil Action No. 2024-3057 (JMC)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff filed a Title VII discrimination and retaliation action. Defendant moved to dismiss. Plaintiff responded and requested leave to amend her complaint.
PRECEDENTIAL VALUE	published
PARTIES	Tiairra Hogan v. Childrens Guild Alliance

TOPICS

- motion to amend
- motions to dismiss
- title vii
- retaliation
- employment discrimination

PRACTICE AREAS

- civil procedure
- employment law
- civil rights

QUESTIONS PRESENTED

- Whether the pro se plaintiff should be granted leave to amend her complaint under Federal Rule of Civil Procedure 15(a)(2).
- Whether the defendant's motion to dismiss should be denied as moot after leave to amend is granted.

HOLDINGS

1. Leave to amend should be granted under Federal Rule of Civil Procedure 15(a)(2) because justice requires it, particularly given Hogan's pro se status, her stated misunderstanding regarding the complaint's required contents, and Defendant's failure to oppose the request.
2. The motion to dismiss the original complaint is moot once leave to amend is granted.

KEY QUOTATIONS

“But courts “should freely give leave” to amend “when justice so requires,” and it so requires here.” (1)

“When a plaintiff amends her complaint, it renders a motion to dismiss that complaint moot.” (2)

FACTUAL BACKGROUND

Hogan brought claims alleging discrimination and retaliation in violation of Title VII of the Civil Rights Act of 1964. While responding to Defendant's motion to dismiss, she requested leave to amend based on her misunderstanding of what needed to be included in the complaint. Defendant did not respond to the request for leave to amend.

PROCEDURAL HISTORY

Hogan filed a complaint alleging discrimination and retaliation under Title VII. Childrens Guild Alliance moved to dismiss, and the Court issued a Fox order directing pro se plaintiff Hogan to respond. Hogan requested leave to amend in her response; the Court granted leave to amend and denied the motion to dismiss as moot.

DISPOSITION

other

CASES CITED

- *Briscoe v. Costco Wholesale Corp.*, 61 F. Supp. 3d 78, 92 (D.D.C. 2014)
- *Texas v. United States*, 798 F.3d 1108, 1114 (D.C. Cir. 2015)
- *Atchinson v. District of Columbia*, 73 F.3d 418, 425 (D.C. Cir. 1996)
- *Gray v. D.C. Pub. Schs.*, 688 F. Supp. 2d 1, 6 (D.D.C. 2010)

OPINION

PER CURIAM.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA TIAIRRA HOGAN, Plaintiff, Case No. 24-cv-3057 (JMC) v. CHILDRENS GUILD ALLIANCE, Defendant. MEMORANDUM OPINION AND ORDER Tiairra Hogan filed this case alleging discrimination and retaliation in violation of Title VII of the Civil Rights Act of 1964. See ECF 2-2 at 8–9.

The Defendant filed a motion to dismiss and, because Hogan is proceeding pro se, the Court issued a Fox order directing Hogan to respond. See ECF 4; ECF 5. When Hogan filed her response, she asked the Court to grant her leave “to amend [her] complaint.” ECF 8 at 1.

The Court GRANTS that request. 1 Hogan did not file her request for leave to amend within 21 days of service of the motion to dismiss and therefore cannot amend as of right. See Fed. R. Civ. P. 15(a)(1)(B); ECF 4; ECF 7. But courts “should freely give leave” to amend “when justice so requires,” and it so requires here. Fed. R. Civ. P. 15(a)(2).

The case for granting Hogan leave to amend is particularly strong for two reasons. First, Hogan is proceeding pro se and seeks leave to amend based on her misunderstanding of what needed to be included in the complaint. See ECF 8 at 1. “[A]n added measure of leniency is extended to pro se litigants with regards to procedural requirements.” *Briscoe v. Costco* 1 Unless otherwise indicated, the formatting of citations has been modified throughout this opinion, for example, by omitting internal quotation marks, emphases, citations, and alterations and by altering capitalization.

All pincites to documents filed on the docket in this case are to the automatically generated ECF Page ID number that appears at the top of each page. 1 *Wholesale Corp.*, 61 F. Supp. 3d 78, 92 (D.D.C. 2014). Second, the Defendant did not respond to Hogan’s request for leave to amend.

Because “the absence of a response” is a “basis for treating” Hogan’s request “as conceded,” the Court has little concern about any risk of unfair prejudice to the Defendant. *Texas v. United States*, 798 F.3d 1108, 1114 (D.C. Cir. 2015); see *Atchinson v. District of Columbia*, 73 F.3d 418, 425 (D.C. Cir. 1996) (discussing need to consider “undue prejudice to the opposing party” when ruling on a motion to amend).

Because the Court grants Hogan’s request for leave to amend, it DENIES the Defendant’s motion to dismiss as moot. See *Gray v. D.C. Pub. Schs.*, 688 F. Supp. 2d 1, 6 (D.D.C. 2010) (“When a plaintiff amends her complaint, it renders a motion to dismiss that complaint moot.”). Hogan is ORDERED to file an amended complaint by May 4, 2026. SO ORDERED.

JIA M. COBB United States District Judge Date: March 19, 2026