

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF HAWAII

**Riki O’Hailpin; Nina Arizumi; Robert Espinosa; Erwin Young;
Puanani Badiang; Sabrina Franks; Ronald Lum; Dan Saiki; Brandee
Aukai v. Hawaiian Airlines, Inc.; Hawaiian Holdings, Inc.**

O’Hailpin v. Hawaiian Airlines, Inc., Civ. No. 22-00532 HG-WRP (D. Haw. Jan. 20, 2026) · No. Civ. No. 22-00532 HG-WRP · Decided January 20, 2026

SUMMARY

This order addresses Hawaiian Airlines and Hawaiian Holdings’ motion to dismiss for lack of subject-matter jurisdiction under the Railway Labor Act. The court holds that Plaintiffs Riki O’Hailpin and Brandee Aukai’s Title VII religious-accommodation claims, and O’Hailpin’s ADA medical-accommodation claim, require interpretation of the applicable collective bargaining agreement and therefore constitute minor disputes subject to the Railway Labor Act’s dispute-resolution procedures. The claims are dismissed with prejudice for lack of subject-matter jurisdiction.

CASE DETAILS

COURT	United States District Court for the District of Hawaii
WRITING FOR THE COURT	Helen Gillmor
JURISDICTION	United States District Court for the District of Hawaii
DECIDED	January 20, 2026
DOCKET	Civ. No. 22-00532 HG-WRP
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendants moved under Federal Rule of Civil Procedure 12(b)(1) to dismiss Plaintiffs O’Hailpin’s and Aukai’s Title VII religious-accommodation claims and O’Hailpin’s ADA disability-accommodation claim for lack of subject-matter jurisdiction under the Railway Labor Act. Plaintiffs opposed, requested jurisdictional discovery, and sought leave to amend to add an intentional-discrimination claim.
STANDARD OF REVIEW	A Rule 12(b)(1) challenge may be facial or factual. In a factual attack, the court may consider affidavits and other evidence outside the pleadings, the complaint’s allegations are not entitled to a presumption of truth, and the plaintiff bears the burden of establishing subject-

	matter jurisdiction. A Railway Labor Act jurisdictional challenge is properly treated as a factual attack.
PRECEDENTIAL VALUE	unpublished
PARTIES	Riki O’Hailpin, Nina Arizumi, Robert Espinosa, Erwin Young, Puanani Badiang, Sabrina Franks, Ronald Lum, Dan Saiki, Brandee Aukai v. Hawaiian Airlines, Inc., Hawaiian Holdings, Inc.

TOPICS

employment law

title vii

ada / disability

subject matter jurisdiction

civil procedure

PRACTICE AREAS

employment law

civil rights

labor law

civil procedure

QUESTIONS PRESENTED

1. Whether the Railway Labor Act deprived the district court of subject-matter jurisdiction over O’Hailpin’s and Aukai’s Title VII failure-to-accommodate claims and O’Hailpin’s ADA failure-to-accommodate claim because resolving them required interpretation of the parties’ collective bargaining agreement.
2. Whether Plaintiffs were entitled to jurisdictional discovery.
3. Whether Plaintiffs should receive leave to amend the complaint to add an intentional-discrimination claim.

HOLDINGS

1. The Railway Labor Act precludes court review of Plaintiffs’ Title VII and ADA failure-to-accommodate claims because determining the availability of the requested accommodations and the asserted undue-hardship defense requires interpretation of the existing collective bargaining agreement.
2. Jurisdictional discovery was not warranted because the jurisdictional issue was whether interpretation of the CBA was legally required, and additional discovery would not alter that determination.
3. Leave to amend was denied because Plaintiffs did not establish good cause to reopen the expired amendment deadline after nearly three years of litigation.

KEY QUOTATIONS

“Courts lack subject-matter jurisdiction to adjudicate minor disputes concerning an existing collective bargaining agreement.” (at 19)

“First, the court examines if the plaintiff’s claim seeks purely to vindicate a right or duty created by the collective bargaining agreement itself.” (at 20)

“The Court agrees with the Hawaiian Defendants that the questions raised by Plaintiffs’ accommodation claims require interpretation of the CBA terms.” (at 32)

“Plaintiffs’ failure-to-accommodate claims are precluded from court review pursuant to the RLA.” (at 39)

FACTUAL BACKGROUND

O’Hailpin and Aukai were Hawaiian Airlines flight attendants and union members covered by a collective bargaining agreement containing seniority, bidding, scheduling, route-assignment, and arbitration provisions. After Hawaiian implemented a mandatory COVID-19 vaccination policy, both plaintiffs sought religious exemptions, and O’Hailpin also sought a medical exemption based on antiphospholipid syndrome. Hawaiian denied the requests; O’Hailpin was placed on unpaid leave before returning to work, while Aukai was vaccinated rather than placed on leave. Plaintiffs alleged that the denials violated Title VII and, as to O’Hailpin’s medical request, the ADA.

PROCEDURAL HISTORY

Plaintiffs filed the complaint on December 22, 2022, asserting Title VII and ADA claims arising from Hawaiian Airlines’ COVID-19 vaccination policy. After extensive pretrial proceedings, Defendants moved to dismiss the claims of O’Hailpin and Aukai under the Railway Labor Act. The court denied jurisdictional discovery and leave to amend, granted the motion, and dismissed Count I as to O’Hailpin and Aukai and Count IV as to O’Hailpin with prejudice for lack of subject-matter jurisdiction.

DISPOSITION

dismissed

CASES CITED

- Thornhill Publishing Co., Inc. v. General Telephone & Electronics Corp., 594 F.2d 730 (9th Cir. 1979)
- Leeson v. Transamerica Disability Income Plan, 671 F.3d 969 (9th Cir. 2012)
- Safe Air for Everyone v. Meyer, 373 F.3d 1035 (9th Cir. 2004)
- Wolfe v. Strankman, 392 F.3d 358 (9th Cir. 2004)
- White v. Lee, 227 F.3d 1214 (9th Cir. 2000)
- Savage v. Glendale Union High School, 343 F.3d 1036 (9th Cir. 2003)
- Moore v. Maricopa County Sheriff’s Office, 657 F.3d 890 (9th Cir. 2011)
- Soper v. United Airlines, Inc., 2024 WL 4800082 (C.D. Cal. Sept. 4, 2024)
- Hinant v. American Airlines, Inc., 2024 WL 4988391 (D. Ariz. Dec. 5, 2024)
- Haralson v. United Airlines, Inc., 224 F. Supp. 3d 928 (N.D. Cal. 2016)
- Consolidated Rail Corp. v. Railway Labor Executives’ Ass’n, 491 U.S. 299 (1989)
- Aircraft Service International, Inc. v. International Brotherhood of Teamsters, 779 F.3d 1069 (9th Cir. 2015) (en banc)
- Elgin, Joliet & Eastern Railway Co. v. Burley, 325 U.S. 711 (1945)
- Herrera v. Command Security Corp., 837 F.3d 979 (9th Cir. 2016)

- Columbia Express Terminal, LLC v. International Longshore & Warehouse Union, 23 F.4th 836 (9th Cir. 2022)
- Livadas v. Bradshaw, 512 U.S. 107 (1994)
- Alaska Airlines, Inc. v. Schurke, 898 F.3d 904 (9th Cir. 2018) (en banc)
- Trans World Airlines, Inc. v. Hardison, 432 U.S. 63 (1977)
- Groff v. DeJoy, 600 U.S. 447 (2023)
- Petersen v. Snohomish Regional Fire & Rescue, 150 F.4th 1211 (9th Cir. 2025)
- Burnside v. Kiewit Pacific Corp., 491 F.3d 1053 (9th Cir. 2007)
- Angeles v. U.S. Airways, Inc., 2013 WL 622032 (N.D. Cal. Feb. 19, 2013)
- McKinley v. Southwest Airlines Co., 680 F. App'x 522 (9th Cir. 2017)
- Edelman v. Western Airlines, Inc., 892 F.2d 839 (9th Cir. 1989)
- Odell v. Kalitta Air, LLC, 678 F. Supp. 3d 904 (E.D. Mich. 2023)
- Stanley v. ExpressJet Airlines, Inc., 808 F. App'x 351 (6th Cir. 2020)
- Whitford v. National Railroad Passenger Corp., 2024 WL 4216050 (W.D.N.Y. Sept. 17, 2024)
- Grindling v. Cathay Pacific Airways, Ltd., 2024 WL 4164234 (N.D. Ill. Sept. 11, 2024)
- Saliba v. American Airlines, Inc., 2022 WL 4131485 (D. Ariz. Sept. 12, 2022)
- Felt v. Atchison, Topeka & Santa Fe Railway Co., 60 F.3d 1416 (9th Cir. 1995)
- Saridakis v. United Airlines, 166 F.3d 1272 (9th Cir. 1999)
- Sjoberg v. United Airlines, Inc., 2024 WL 4219736 (S.D. Tex. Sept. 17, 2024)
- Arbaugh v. Y&H Corp., 546 U.S. 500 (2006)
- Pearson v. Northwest Airlines, Inc., 659 F. Supp. 2d 1084 (C.D. Cal. 2009)