

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON

Jessica Vo v. Meta Platforms, Inc.

Vo · No. 3:25-cv-01602-JR · Decided May 15, 2026

SUMMARY

The United States District Court for the District of Oregon adopts a magistrate judge’s findings and recommendation in an employment discrimination action. The court grants Meta Platforms, Inc.’s motion to compel arbitration and denies as moot its motion to stay discovery.

CASE DETAILS

COURT	United States District Court for the District of Oregon
WRITING FOR THE COURT	Adrienne Nelson
JURISDICTION	United States District Court for the District of Oregon
DECIDED	May 15, 2026
DOCKET	3:25-cv-01602-JR
DISPOSITION	other
PROCEDURAL POSTURE	The district court reviewed a magistrate judge's findings and recommendation recommending that Meta's motion to compel arbitration be granted. No party filed objections. The court adopted the findings and recommendation, granted the motion to compel arbitration, and denied as moot Meta's motion to stay discovery.
STANDARD OF REVIEW	When no timely objection is filed to a magistrate judge's findings and recommendation, the district court reviews for clear error on the face of the record; no review is required in the absence of objections, although the district court may review sua sponte under a de novo or other standard.
PRECEDENTIAL VALUE	unpublished district court order

TOPICS

- arbitration
- discovery dispute
- civil procedure
- employment discrimination

PRACTICE AREAS

- civil procedure
- employment law
- arbitration

QUESTIONS PRESENTED

1. What standard of review applies when no party objects to a magistrate judge's findings and recommendation?
2. Whether the magistrate judge's findings and recommendation recommending that Meta's motion to compel arbitration be granted contained clear error on the face of the record.
3. Whether Meta's motion to stay discovery should be granted after the motion to compel arbitration was granted.

HOLDINGS

1. When no party timely objects to a magistrate judge's findings and recommendation, the district court reviews the recommendation for clear error on the face of the record.
2. The findings and recommendation contained no clear error on the face of the record and was adopted.
3. Meta's motion to compel arbitration was granted.
4. Meta's motion to stay discovery pending resolution of the motion to compel arbitration was denied as moot because the arbitration motion was resolved and granted.

FACTUAL BACKGROUND

The action is an employment discrimination case brought by Jessica Vo against Meta Platforms, Inc. Meta moved to compel arbitration and separately moved to stay discovery pending resolution of the arbitration motion. The magistrate judge recommended granting the motion to compel arbitration, and no party objected to that recommendation.

PROCEDURAL HISTORY

United States Magistrate Judge Jolie A. Russo issued findings and a recommendation on April 20, 2026, recommending that Meta Platforms, Inc.'s motion to compel arbitration be granted. The parties did not object by the May 4, 2026 deadline. District Judge Adrienne Nelson reviewed the recommendation for clear error on the face of the record, found none, adopted it, granted the motion to compel arbitration, and denied the motion to stay discovery as moot.

DISPOSITION

other

CASES CITED

- Thomas v. Arn, 474 U.S. 140, 152-54 (1985)
- United States v. Reyna-Tapia, 382 F.3d 1114, 1121 (9th Cir. 2003) (en banc)
- Decker v. Berryhill, 856 F.3d 659, 663 (9th Cir. 2017)
- Hayden v. United States, 147 F. Supp. 3d 1125, 1127 (D. Or. 2015)

OPINION

Vo

PER CURIAM.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

JESSICA VO, Case No.: 3:25-cv-01602-JR Plaintiff, v.

ORDER

META PLATFORMS, INC.,

Defendant. Adrienne Nelson, District Judge: United States Magistrate Judge Jolie A. Russo issued a findings and recommendation (“F&R”) in this employment discrimination action on April 20, 2026, ECF 29. The F&R recommends that defendant Meta Platforms Inc.’s motion to compel arbitration should be granted. F&R 1. No party has filed objections, which were due by May 4, 2026. Id. at 13. The matter is now before this Court pursuant to 28 U.S.C. § 636(b)(1)(B) and Federal Rule of Civil Procedure 72(b). A district court judge may “accept, reject, or modify, in whole or in part, the findings or recommendations made by the magistrate judge.” 28 U.S.C. § 636(b)(1)(C). No standard of review is prescribed for portions for the report for which no objections are filed, and no review is required in the absence of objections. *Thomas v. Arn*, 474 U.S. 140, 152-54 (1985); *United States v. Reyna-Tapia*, 382 F.3d 1114, 1121 (9th Cir. 2003) (en banc). A district judge is not, however, precluded from reviewing the report sua sponte under a de novo, or any other, standard. *Thomas*, 474 U.S. at 154; *Decker v. Berryhill*, 856 F.3d 659, 663 (9th Cir. 2017). Courts in this district have followed the Advisory Committee’s recommendation that, when no timely objection is filed, findings and recommendations be reviewed for “clear error on the face of the record.” Fed. R. Civ. P. 72(b) advisory committee’s note to 1983 amendment; see, e.g., *Hayden v. United States*, 147 F. Supp. 3d 1125, 1127 (D. Or. 2015) (following the recommendation of the Advisory Committee and reviewing magistrate judge’s findings and recommendations for “clear error on the face of the record”). Because no party in this case has made objections to the F&R, the Court reviews the F&R for clear error on the face of the record. Finding no such error, the Court ADOPTS the F&R, ECF 29. Defendant’s motion to compel arbitration, ECF 18, is granted accordingly. Defendant’s motion to stay discovery pending resolution of the motion to compel arbitration, ECF 25, is denied as moot.

CONCLUSION

For the foregoing reasons, the Court ADOPTS the Findings and Recommendations, ECF 29. Defendant’s Motion to Compel Arbitration, ECF 18, is GRANTED and Defendant’s Motion to Stay Discovery Pending Resolution of the Motion to Compel Arbitration, ECF 25, is DENIED as moot. IT IS SO ORDERED. DATED this 15th day of May, 2026. . United States District Judge