

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF KANSAS

Christopher Wiles v. Mary Rezac

No. 25-2429-EFM-ADM (D. Kan. Apr. 3, 2026) · No. 25-2429-EFM-ADM · Decided April 3, 2026

SUMMARY

The United States District Court for the District of Kansas grants Defendant Mary Rezac’s Rule 12(b) (6) motion to dismiss claims brought by Christopher Wiles concerning the termination of his employment at the University of Kansas. The court concludes that, assuming Wiles had a protected property interest, the pre- and post-termination procedures available under the Kansas Judicial Review Act satisfied due process, and it also addresses qualified and Eleventh Amendment immunity. The court declines supplemental jurisdiction over Wiles’s state-law tortious-interference claim and closes the case.

CASE DETAILS

COURT	United States District Court for the District of Kansas
WRITING FOR THE COURT	Eric F. Melgren
JURISDICTION	United States District Court for the District of Kansas
DECIDED	April 3, 2026
DOCKET	25-2429-EFM-ADM
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendant moved under Federal Rule of Civil Procedure 12(b)(6) to dismiss claims alleging Fourteenth Amendment procedural due process violations under 42 U.S.C. § 1983 and state-law tortious interference with prospective business relations.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded factual allegations as true but need not accept legal conclusions, and asks whether the complaint states a facially plausible claim for relief.
PRECEDENTIAL VALUE	unpublished or nonprecedential district court memorandum and order; no reporter citation appears
PARTIES	Christopher Wiles v. Mary Rezac

TOPICS

- motions to dismiss
- due process
- section 1983
- sovereign immunity
- intentional interference with expectancy

PRACTICE AREAS

civil procedure

constitutional law

civil rights

employment law

torts

QUESTIONS PRESENTED

1. Whether Wiles adequately alleged that he was deprived of procedural due process when his University of Kansas employment was terminated without just cause and without a separate post-termination hearing.
2. Whether Rezac was entitled to qualified immunity on Wiles's individual-capacity due process claim.
3. Whether Rezac was immune under the Eleventh Amendment from Wiles's official-capacity claim.
4. Whether the court should exercise supplemental jurisdiction over Wiles's state-law tortious-interference claim after dismissing all federal claims.

HOLDINGS

1. Even assuming Wiles possessed a protected property interest in continued employment, he failed to state a procedural due process claim because he received meaningful pre-termination procedures and the Kansas Judicial Review Act provided an adequate opportunity for post-termination review.
2. Rezac was entitled to qualified immunity because Wiles failed to show a constitutional violation, and, in any event, the asserted right to a post-termination hearing separate from judicial review under the Kansas Judicial Review Act was not clearly established.
3. Rezac was immune from Wiles's official-capacity claim because it was effectively a claim against the State and Wiles did not allege an ongoing violation of federal law sufficient to invoke the Ex parte Young exception.
4. The court declined to exercise supplemental jurisdiction over the state-law tortious-interference claim after dismissing all federal claims.

KEY QUOTATIONS

“Because he had “a meaningful opportunity to explain his position and challenge his dismissal pre-termination,” the KJRA’s post-termination process is more than sufficient to satisfy the demands of due process.” (Section III.A.2)

“When all federal claims have been dismissed, the court may, and usually should, decline to exercise jurisdiction over any remaining state claims.” (Section III.B)

FACTUAL BACKGROUND

Christopher Wiles was employed by the University of Kansas and served as Assistant Dean in its School of Engineering. Dean Mary Rezac proposed Wiles's termination based on reports concerning his behavior and leadership, gave him an opportunity to respond, and directed Human Resources to conduct an investigation. Rezac then terminated Wiles effective July 20, 2024, and stated that there would be no further University appeal or grievance.

PROCEDURAL HISTORY

Wiles filed suit on August 1, 2025, asserting official-capacity and individual-capacity due process claims against Rezac and a state-law tortious-interference claim. Rezac moved to dismiss, and after briefing the court granted the motion, dismissed the federal claims, declined supplemental jurisdiction over the state-law claim, and closed the case.

DISPOSITION

dismissed

CASES CITED

- Ridge at Red Hawk, LLC v. Schneider, 493 F.3d 1174, 1177 (10th Cir. 2007)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 556, 570 (2007)
- Ashcroft v. Iqbal, 556 U.S. 662, 678–79 (2009)
- Robbins v. Oklahoma, 519 F.3d 1242, 1248 (10th Cir. 2008)
- Merrifield v. Bd. of Cnty. Comm’rs, 654 F.3d 1073, 1078 (10th Cir. 2011)
- Reams v. City of Frontenac, 587 F. Supp. 3d 1082, 1094–95 (D. Kan. 2022)
- Hesse v. Town of Jackson, 541 F.3d 1240, 1245 (10th Cir. 2008)
- Bruce v. Kelly, 2023 WL 8697811, at *13 (D. Kan. Dec. 15, 2023)
- Eisenhour v. Weber Cnty., 744 F.3d 1220, 1232 (10th Cir. 2014)
- Farthing v. City of Shawnee, 39 F.3d 1131, 1136 (10th Cir. 1994)
- Stoldt v. City of Toronto, 234 Kan. 957, 678 P.2d 153, 160 (1984)
- Kosik v. Cloud Cnty. Cmty. Coll., 250 Kan. 507, 827 P.2d 59, 63 (1992)
- Benavidez v. City of Albuquerque, 101 F.3d 620, 626 (10th Cir. 1996)
- Cleveland Bd. of Educ. v. Loudermill, 470 U.S. 532, 543 n.8 (1985)
- Tonkovich v. Kan. Bd. of Regents, 159 F.3d 504, 526 (10th Cir. 1998)
- Barrow v. Kan. State Univ., 2023 WL 10101935, at *6 (10th Cir. Oct. 25, 2023)
- Tao v. Univ. of Kan., 2026 WL 237315, at *8 (D. Kan. Jan. 29, 2026)
- Klassen v. Univ. of Kan. Sch. of Med., 84 F. Supp. 3d 1228, 1242, 1245, 1248 (D. Kan. 2015)
- Pennhurst State Sch. & Hosp. v. Halderman, 465 U.S. 89, 121 (1984)
- Hill v. Kemp, 478 F.3d 1236, 1255 (10th Cir. 2007)
- Ex parte Young, 209 U.S. 123 (1908)
- Rounds v. Clements, 495 F. App’x 938, 940 (10th Cir. 2012)
- Tufaro v. Oklahoma ex rel. Bd. of Regents of Univ. of Okla., 107 F.4th 1121, 1141 (10th Cir. 2024)
- Smith v. City of Enid ex rel. Enid City Comm’n, 149 F.3d 1151, 1156 (10th Cir. 1998)

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