

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLORADO

Christopher Morris v. Frontier Airlines, Inc.

Civil Action No. 25-cv-03912-NYW-KAS (D. Colo. Jan. 8, 2026) · No. Civil Action No. 25-cv-03912-NYW-KAS · Decided January 8, 2026

SUMMARY

The United States District Court for the District of Colorado denied Christopher Morris’s motion to stay proceedings pending a forthcoming motion to remand, or alternatively to extend the deadline to respond to Frontier Airlines’ motion to dismiss. Applying the String Cheese factors, the court concluded that a stay was not warranted and ordered Morris to respond to the motion to dismiss by January 16, 2026.

CASE DETAILS

COURT	United States District Court for the District of Colorado
WRITING FOR THE COURT	Nina Y. Wang
JURISDICTION	United States District Court for the District of Colorado
DECIDED	January 8, 2026
DOCKET	Civil Action No. 25-cv-03912-NYW-KAS
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved to stay all proceedings, or alternatively to extend the time to respond to Defendant's Rule 12(b)(1) motion to dismiss, pending determination of Plaintiff's forthcoming motion to remand. The court denied the motion to stay and ordered Plaintiff to respond to the motion to dismiss by January 16, 2026.
STANDARD OF REVIEW	The decision whether to stay proceedings is committed to the court's discretion and requires balancing competing interests. The proponent of a stay bears the burden of establishing its need.
PRECEDENTIAL VALUE	Unpublished district court order; precedential status is unknown.
PARTIES	Christopher Morris v. Frontier Airlines, Inc.

TOPICS

- civil procedure
- motions to dismiss
- subject matter jurisdiction
- class actions
- noncompete agreements

PRACTICE AREAS

civil procedure

removal and remand

employment law

QUESTIONS PRESENTED

1. Whether the court should stay all proceedings or extend the deadline to respond to Frontier's Rule 12(b)(1) motion pending resolution of Morris's forthcoming motion to remand.
2. Whether the String Cheese factors supported a stay in light of potentially intertwined jurisdictional issues.

HOLDINGS

1. A stay or indefinite extension was not warranted because the relevant factors weighed against delaying briefing and resolution of the pending jurisdictional motion.

KEY QUOTATIONS

“[T]he power to stay proceedings is incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants.”

“The proponent of a stay bears the burden of establishing its need.”

FACTUAL BACKGROUND

Christopher Morris alleged that Frontier Airlines failed to pay wages required by Colorado law and required him to enter into an unlawful noncompete or training-repayment agreement. He brought the claims as a putative class action in Colorado state court, and Frontier removed the case. Frontier subsequently moved to dismiss under Rule 12(b)(1), asserting that Morris lacked Article III standing and that his restrictive-covenant claim was preempted by the Railway Labor Act.

PROCEDURAL HISTORY

Morris originally filed a putative class action in Colorado state court alleging violations of Colorado wage laws and an unlawful noncompete or training-repayment agreement. Frontier removed the action based on the Class Action Fairness Act and asserted federal-question jurisdiction. Frontier then moved to dismiss under Rule 12(b)(1), arguing lack of Article III standing and Railway Labor Act preemption. Morris moved to stay proceedings pending a forthcoming motion to remand; the district court denied the stay without prejudice.

DISPOSITION

other

CASES CITED

- Landis v. N. Am. Co., 299 U.S. 248, 254–55 (1936)
- Kremmling Sanitation Dist. v. Everest Nat. Ins. Co., No. 09-cv-00635-PAB-BNB, 2009 WL 1324124, at *1 (D. Colo. May 12, 2009)

- Kissing Camels Surgery Ctr., LLC v. Centura Health Corp., No. 12-cv-03012-WJM-NYW, 2015 WL 9304625, at *4 (D. Colo. Dec. 22, 2015)
- Profitstreams LLC v. Ameranth, Inc., No. 11-cv-01710-RBJ-KLM, 2011 WL 5024912, at *1 (D. Colo. Oct. 21, 2011)
- United Food & Com. Workers Int'l Union, Loc. No. 7 v. King Soopers, Inc., No. 13-cv-02335-RM-KMT, 2014 WL 2536489, at *1 (D. Colo. June 5, 2014)
- Clarendon Nat'l Ins. Co. v. Glickauf, No. 18-cv-02549-CMA-NYW, 2019 WL 1897845, at *2 (D. Colo. Feb. 14, 2019)
- String Cheese Incident, LLC v. Stylus Shows, Inc., No. 05-cv-01934-LTB-PAC, 2006 WL 894955, at *2 (D. Colo. Mar. 30, 2006)
- Howell v. Gate Gourmet, Inc., No. 24-cv-00633-RMR-KAS, 2024 WL 5055585, at *2–3 (D. Colo. June 19, 2024)
- Bank of Colorado v. Wibaux 1, LLC, No. 17-cv-02871-CMA-KMT, 2018 WL 2562662, at *4 (D. Colo. June 4, 2018)
- Downey v. Am. Nat'l Prop. & Cas. Co., No. 1:11-cv-00587-MCA-KBM, 2012 WL 13071548, at *11 (D.N.M. Mar. 31, 2012)
- Arocho v. Nafzinger, No. 07-cv-02603-REB-KLM, 2008 WL 5101701, at *1 (D. Colo. Dec. 1, 2008)
- Ashaheed v. Currington, No. 17-cv-03002-WJM-SKC, 2019 WL 11690136, at *3 (D. Colo. Nov. 4, 2019)