

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
LOUISIANA

Broderick K. Rainey v. Marathon Petroleum Company LP

Rainey · No. 2:25-cv-02047 · Decided June 17, 2026

SUMMARY

The United States District Court for the Eastern District of Louisiana considered Marathon Petroleum Company LP's Rule 12(b)(6) motion to dismiss Broderick K. Rainey's claims under the Americans with Disabilities Act. The court denied dismissal of the claims that Rainey was a qualified individual and was regarded as disabled, but dismissed the failure-to-accommodate claim without prejudice and allowed amendment. The order addresses the interaction between ADA claims and federal medical-qualification requirements for commercial motor vehicle drivers.

CASE DETAILS

COURT	United States District Court for the Eastern District of Louisiana
WRITING FOR THE COURT	Karen Wells Roby
JURISDICTION	United States District Court for the Eastern District of Louisiana
DECIDED	June 17, 2026
DOCKET	2:25-cv-02047
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved under Federal Rule of Civil Procedure 12(b)(6) to dismiss the plaintiff's claims under the Americans with Disabilities Act. The motion was granted in part without prejudice as to the failure-to-accommodate claim and denied as to the qualified-individual and regarded-as-disability claims.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded facts as true, views them in the light most favorable to the plaintiff, and asks whether the complaint contains sufficient factual matter to state a facially plausible claim. The court may consider documents attached to a motion to dismiss when they are referred to in the complaint and integral and central to the claim, but it declined to consider additional documents here because they were not referred to in the complaint and were not necessary to determine whether the complaint stated a claim.
PRECEDENTIAL VALUE	unpublished district-court decision

PARTIES

Broderick K. Rainey v. Marathon Petroleum Company LP

TOPICS

ada discrimination

regarded as disabled

reasonable accommodation

motions to dismiss

pleadings

PRACTICE AREAS

employment law

disability discrimination

civil rights

QUESTIONS PRESENTED

1. Whether the complaint plausibly alleged that Rainey was a qualified individual with a disability for purposes of his ADA claims despite Marathon's contention that he failed DOT medical-certification requirements.
2. Whether the complaint plausibly stated an ADA failure-to-accommodate claim when it alleged that Marathon knew of Rainey's condition and refused accommodations, but did not allege that Rainey formally requested an accommodation or that his condition substantially limited a major life activity.
3. Whether the complaint plausibly stated an ADA regarded-as-disability claim by alleging that Marathon perceived Rainey's kidney disease and dialysis treatment as more limiting than they actually were.

HOLDINGS

1. At the pleading stage, Rainey's allegations plausibly stated that he was qualified to perform the light-product transport-driver position. The complaint did not establish as a matter of law that his kidney disease or dialysis treatment categorically disqualified him under the FMCSA regulations, and the pleadings did not show whether the medical provider made the individualized regulatory assessment required by 49 C.F.R. § 391.41(d)(3)(ii).
2. The complaint failed to state a plausible failure-to-accommodate claim because it did not allege how Rainey's kidney disease or dialysis requirement substantially limited a major life activity and therefore did not adequately plead that he had a disability under the ADA. The claim was dismissed without prejudice, with leave to amend.
3. The complaint plausibly stated a regarded-as disability-discrimination claim by alleging that Marathon perceived Rainey's kidney disease and dialysis treatment as substantially more limiting than they actually were and revoked his employment offer because of that perception.

KEY QUOTATIONS

“To survive a motion to dismiss, a complaint must contain sufficient factual matter, accepted as true, to ‘state a claim to relief that is plausible on its face.’”

“The complaint further fails to allege how Rainey’s autoimmune kidney disease or dialysis requirement substantially limited one or more major life activity and therefore constituted a disability under applicable law.”

“Taken Rainey’s allegations as true, Rainey states a claim for “regarded as” ADA discrimination.”

FACTUAL BACKGROUND

Broderick K. Rainey suffers from chronic kidney disease and IgM nephropathy, treated with medication, medical monitoring, and daily peritoneal dialysis. Marathon offered him employment as a professional light-product transport driver in Garyville, Louisiana, conditioned on his passing a pre-employment physical, but rescinded the offer after claiming he failed the examination. Rainey alleged that he was medically capable of performing the essential duties, satisfied Department of Transportation requirements, and could perform the job with accommodations such as periodic breaks and time for medical appointments or dialysis. He also alleged that Marathon withdrew the offer because of bias concerning his kidney disease and dialysis treatment.

PROCEDURAL HISTORY

Rainey filed an ADA complaint after Marathon rescinded a conditional employment offer for a commercial truck-driver position. Marathon moved to dismiss under Rule 12(b)(6). The court considered the allegations in the complaint, declined to convert the motion into one for summary judgment, denied dismissal of the qualified-individual and regarded-as claims, dismissed the failure-to-accommodate claim without prejudice, and allowed Rainey 20 days to amend.

DISPOSITION

other

REMAND INSTRUCTIONS

No remand was ordered. Rainey was granted leave to amend the failure-to-accommodate claim within 20 days after the order was signed.

CASES CITED

- Benton v. United States, 960 F.2d 19, 21 (5th Cir. 1992)
- Ashcroft v. Iqbal, 556 U.S. 662, 677-79 (2009)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555-58, 570 (2007)
- In re Great Lakes Dredge & Dock Co., 624 F.3d 201, 210 (5th Cir. 2010)
- Guidry v. American Public Life Insurance Co., 512 F.3d 177, 180 (5th Cir. 2008)
- Great Plains Trust Co. v. Morgan Stanley Dean Witter & Co., 313 F.3d 305, 329 (5th Cir. 2002)
- Williams v. J.B. Hunt Transp., Inc., 826 F.3d 806, 806, 808, 811, 813 (5th Cir. 2016)
- Talbot v. Maryland Transit Administration, No. WMN-12-1507, 2012 WL 5839945, at *2 (D. Md. Nov. 15, 2012)
- Harris v. P.A.M. Transportation, Inc., 339 F.3d 635, 637-39 (8th Cir. 2003)
- Bay v. Cassens Transportation Co., 212 F.3d 969, 973-76 (7th Cir. 2000)
- Rodrigues v. ConAgra Grocery Products Co., 436 F.3d 468, 477 (5th Cir. 2006)

- *Caldera v. Insurance Co. of the State of Pennsylvania*, 716 F.3d 861, 867 n.11 (5th Cir. 2013)
- *Premiere Network Services, Inc. v. SBC Communications, Inc.*, 440 F.3d 683, 686 n.5 (5th Cir. 2006)
- *Collins v. Morgan Stanley Dean Witter*, 224 F.3d 496, 498-99 (5th Cir. 2000)
- *Feist v. Louisiana Department of Justice, Office of the Attorney General*, 730 F.3d 450, 452 (5th Cir. 2013)
- *J. W. v. Paley*, 81 F.4th 440, 450 (5th Cir. 2023)
- *Ball v. LeBlanc*, 792 F.3d 584, 596 n.9 (5th Cir. 2015)
- *G.W. v. Whitehouse Independent School District*, 2026 WL 788865 (E.D. Tex. Mar. 20, 2026)
- *Torres v. Cornerstone Fitness Tx, LLC*, No. 5:22-cv-01190, 2023 WL 11844983, at *3 (W.D. Tex. May 9, 2023)
- *Hale v. King*, 642 F.3d 492 (5th Cir. 2011)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/federal/united-states-district-court-for-the-eastern-district-of-lou/2026/broderick-k-rainey-v-marathon-petroleum-company-lp-tosk1xm0>