

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA

Eniola Famuyide v. Chipotle Mexican Grill, Inc., and Chipotle Services, LLC

Famuyide · No. 23-cv-01127 (DFW/ECW) · Decided March 18, 2026

SUMMARY

The United States District Court for the District of Minnesota addresses competing motions concerning a Rule 30(b)(6) deposition in Eniola Famuyide’s action against Chipotle entities. The Court denies Chipotle Services, LLC’s motion for a protective order and grants Plaintiff’s motion to compel and for sanctions, except for the requested evidentiary sanctions. The order discusses the parties’ obligations under Rules 26, 30, and 37 and Local Rule 7.1, including preparation of corporate witnesses, meet-and-confer requirements, and monetary sanctions.

CASE DETAILS

COURT	United States District Court for the District of Minnesota
JURISDICTION	United States District Court for the District of Minnesota
DECIDED	March 18, 2026
DOCKET	23-cv-01127 (DFW/ECW)
DISPOSITION	other
PROCEDURAL POSTURE	The court considered Chipotle Services, LLC's motion for a protective order concerning a Rule 30(b)(6) deposition and Plaintiff's motion to compel a second deposition and for sanctions.
STANDARD OF REVIEW	Discovery-management discretion under Federal Rules of Civil Procedure 26, 30, and 37, including whether deposition topics are reasonably particular, relevant, proportional, or unreasonably cumulative or duplicative, and whether sanctions are appropriate.
PRECEDENTIAL VALUE	Unknown; federal district court discovery order

TOPICS

discovery dispute sanctions civil procedure sexual harassment employment law

PRACTICE AREAS

civil procedure employment law discovery sanctions

QUESTIONS PRESENTED

1. Whether Defendants' motion for a protective order should be granted because the Rule 30(b)(6) topics were insufficiently particular, irrelevant, disproportionate, cumulative, or duplicative.
2. Whether Defendants failed to meet and confer in good faith before seeking protection as to topics for which they had previously withdrawn objections.
3. Whether Defendants were required to produce adequately prepared corporate witnesses for a second Rule 30(b)(6) deposition.
4. Whether Plaintiff was entitled to evidentiary, monetary, and other sanctions for Defendants' conduct during the deposition process.
5. Whether discovery into Defendants' preservation efforts and EEOC consent decrees was permissible under the circumstances.

HOLDINGS

1. The motion for a protective order was denied in its entirety. The disputed topics were reasonably particular and within the permissible scope of discovery; Defendants did not establish that the topics were unreasonably cumulative, duplicative, irrelevant, or disproportionate.
2. Defendants failed to meet and confer in good faith before filing the protective-order motion as to Topics 5, 6, 8, 14, and 15, after withdrawing their objections and later reversing position without notifying Plaintiff.
3. Defendants were ordered to designate and make available one or more adequately prepared corporate witnesses for a second Rule 30(b)(6) deposition on Topics 4-6, 8, 11-19, and 21-24.
4. Topics 21 and 22, concerning Defendants' steps to preserve evidence, were within the permissible scope of discovery because Defendants' discovery compliance had reasonably been called into question and an adequate factual basis existed for the inquiry.
5. The Jerome Consent Decree imposed nationwide obligations on Chipotle Services, LLC, including at the Rochester, Minnesota restaurant, because it required Chipotle to maintain specified anti-discrimination policies nationwide.
6. Plaintiff was entitled to reasonable expenses and attorney's fees incurred in bringing the motion to compel and in traveling to the August 12, 2025 deposition, plus additional case-management sanctions. Evidentiary sanctions were denied at that time.

KEY QUOTATIONS

“Once notified as to the reasonably particularized areas of inquiry, the corporation then must not only produce such number of persons as will satisfy the request, but more importantly, prepare them so that they may give complete, knowledgeable and binding answers on behalf of the corporation.” (Section II.A)

“Failure to produce a sufficiently prepared witness or witnesses will result in additional, more severe sanctions under Rule 37(b)(2).” (Section III.C)

FACTUAL BACKGROUND

Plaintiff alleged that Chipotle hired Lionell Bailey, a registered sex offender, who sexually harassed and sexually assaulted her while she worked at a Chipotle restaurant. Plaintiff noticed a Rule 30(b)(6) deposition covering 23 topics, later amended the notice after meet-and-confer discussions, and rescheduled the deposition at Defendants' request to California. Defendants withdrew objections to several topics, but filed a protective-order motion late the night before the deposition and produced a witness on only a subset of the topics. The witness had prepared for only three or four hours and gave testimony that the court found incomplete, contradictory, or based on assumptions.

PROCEDURAL HISTORY

Plaintiff filed an employment-related action alleging that Defendants hired a registered sex offender who sexually harassed and sexually assaulted her at a Chipotle restaurant. Plaintiff noticed a Rule 30(b)(6) deposition, and Defendants objected to most topics, later withdrawing and then reversing objections to several topics immediately before the deposition. After Defendants produced an inadequately prepared witness and filed a last-minute motion for a protective order, Plaintiff moved to compel and for sanctions. Following a September 30, 2025 hearing, the court denied the protective order, ordered a second Rule 30(b)(6) deposition, and imposed monetary and case-management sanctions, but denied evidentiary sanctions.

DISPOSITION

other

CASES CITED

- Prokosch v. Catalina Lighting, Inc., 193 F.R.D. 633, 638-39 (D. Minn. 2000)
- Arctic Cat, Inc. v. Injection Research Specialists, Inc., 210 F.R.D. 680, 686 (D. Minn. 2002)
- ProDox, LLC v. Pro. Document Servs., Inc., 341 F.R.D. 679, 682-84 (D. Nev. 2022), objections overruled, 2022 WL 2275185 (D. Nev. June 22, 2022)
- Yang v. Robert Half Int'l, Inc., No. 19-CV-2669 (NEB/DTS), 2020 WL 5366771, at *2 (D. Minn. Sept. 8, 2020), aff'd, 79 F.4th 949 (8th Cir. 2023)
- Willy v. Sherwin-Williams Co., No. 3:21-CV-00054-AR, 2022 WL 1553703, at *4 (D. Or. May 17, 2022)
- Johnson v. Charps Welding & Fabricating, Inc., No. 14-CV-2081 (RHK/LIB), 2016 WL 11268315, at *7 (D. Minn. Apr. 19, 2016)
- Zayed v. Buysse, No. CV 11-1042 (SRN/FLN), 2011 WL 13239532, at *5 (D. Minn. Oct. 19, 2011), aff'd sub nom. Zayed for Cook v. Buysse, 2011 WL 13239488 (D. Minn. Dec. 2, 2011)
- Upsher-Smith Labs., Inc. v. Fifth Third Bank, No. 16-CV-0556 (JRT/HB), 2018 WL 11424200, at *13 (D. Minn. Apr. 23, 2018)
- AGA Med. Corp. v. W.L. Gore & Assocs., Inc., No. CV 10-3734 (JNE/JSM), 2011 WL 13135783, at *3 (D. Minn. Dec. 13, 2011)
- Bowers v. Mortg. Elec. Registration Sys., Inc., Civil Case No. 10-4141-JTM, 2011 WL 6013092, at *6-7 (D. Kan. Dec. 2, 2011)
- Prairie River Home Care, Inc. v. Procura, LLC, No. 17-CV-5121 (JRT/HB), 2019 WL 13248862, at *17-19 (D. Minn. Aug. 5, 2019)

- Sage as Tr. for Sage v. Bridgestone Ams. Tire Operations, LLC, No. CV 18-3170 (DSD/BRT), 2020 WL 13043386, at *2 (D. Minn. Jan. 27, 2020)
- QBE Ins. Corp. v. Jorda Enters., Inc., 277 F.R.D. 676, 689 (S.D. Fla. 2012)
- 3M Innovative Props. Co. v. Tomar Elecs., No. CIV 05-756 MJD/AJB, 2006 WL 2670038, at *10 (D. Minn. Sept. 18, 2006)
- Fuller v. Fiber Glass Sys., LP, 618 F.3d 858, 864 (8th Cir. 2010)
- Klein v. Affiliated Grp., Inc., No. 18-CV-949 DWF/ECW, 2019 WL 246768, at *9 (D. Minn. Jan. 17, 2019)
- W. Virginia Pipe Trades Health & Welfare Fund v. Medtronic, Inc., No. 13-cv-1686 (JRT/FLN), 2017 WL 9325026, at *7 (D. Minn. Oct. 12, 2017)
- Starline Windows Inc. v. Quanex Bldg. Prods. Corp., No. 15-CV-1282-L (WVG), 2016 WL 4485564, at *2 (S.D. Cal. July 21, 2016)
- Berry v. County, No. 20-cv-2189, 2023 WL 1777467, at *6 (D. Minn. Feb. 6, 2023)
- Speed RMG Partners, LLC v. Arctic Cat Sales Inc., No. 20-CV-609 (NEB/LIB), 2021 WL 5087362, at *11 (D. Minn. Jan. 5, 2021)
- Gross v. Chapman, No. 19 C 2743, 2020 WL 4336062, at *2 (N.D. Ill. July 28, 2020)
- Cronin v. Sanuwave Health, Inc., No. 23-CV-1295 (SRN/ECW), 2024 WL 3518142, at *14 (D. Minn. July 24, 2024)
- Burlington Industries, Inc. v. Ellerth, 524 U.S. 742 (1998)
- Faragher v. City of Boca Raton, 524 U.S. 775 (1998)