UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT

Natalie Thomas v. EOTech, LLC

Thomas · No. 25-1094 · Decided March 4, 2026

SUMMARY

The Fourth Circuit held that private parties may not prospectively shorten the time an employee has to bring otherwise timely Title VII or ADEA claims because doing so would disrupt the statutes' integrated and uniform remedial schemes. The court affirmed dismissal of the Maryland Fair Employment Practice Act claims under Maryland law, vacated summary judgment on the federal claims, and remanded for further proceedings.

CASE DETAILS

COURT	United States Court of Appeals for the Fourth Circuit
WRITING FOR THE COURT	Toby Heytens; Harris; Benjamin
JURISDICTION	United States Court of Appeals for the Fourth Circuit
DECIDED	March 4, 2026
DOCKET	25-1094
DISPOSITION	other
PROCEDURAL POSTURE	Appeal from the district court's grant of summary judgment to EOTech on Title VII, ADEA, and Maryland Fair Employment Practice Act claims based on a contractual 180-day limitations provision.
STANDARD OF REVIEW	Summary judgment is reviewed de novo under the same legal standards applied by the district court.
PRECEDENTIAL VALUE	precedential
PARTIES	Natalie Thomas v. EOTech, LLC

TOPICS

title vii · age discrimination · employment discrimination · statutory interpretation · appellate procedure

PRACTICE AREAS

employment law · civil rights · contracts · appellate procedure

QUESTIONS PRESENTED

1. Whether a private agreement may prospectively shorten the statutory period for bringing Title VII or ADEA claims.
2. Whether the 180-day Limitations Agreement validly shortened the period for bringing Thomas's MFEPA claims under Maryland law.
3. Whether the district court properly granted summary judgment based on the Limitations Agreement.

HOLDINGS

1. Parties may not prospectively render untimely a lawsuit that would otherwise be timely under Title VII or the ADEA.
2. The district court did not commit reversible error in concluding that the Limitations Agreement barred Thomas's MFEPA claims under Maryland law.

KEY QUOTATIONS

> *"Joining the Sixth Circuit, we hold the answer is no because judicial enforcement of such agreements would disrupt the relevant statutes' carefully integrated and uniform remedial schemes."* (2)

> *"We agree with the Sixth Circuit that allowing private parties to prospectively shorten the time an employee has to bring suit under Title VII or the ADEA would "abrogate[] substantive rights and contravene[] Congress's uniform nationwide legal regime for Title VII" and ADEA lawsuits."* (7)

> *"The judgment is thus affirmed in part and vacated in part, and the case is remanded for further proceedings consistent with this opinion."* (16)

FACTUAL BACKGROUND

Before beginning work for EOTech, Natalie Thomas signed an employer-drafted agreement purporting to limit to 180 days the time to bring employment-related claims, while tolling the period during the pendency of an administrative charge. EOTech terminated Thomas on November 9, 2022. She filed administrative discrimination charges on February 23, 2023, received an EEOC right-to-sue letter on September 7, 2023, and filed suit on December 6, 2023.

PROCEDURAL HISTORY

Thomas sued EOTech after her termination, alleging violations of Title VII, the ADEA, and MFEPA. The district court converted EOTech's motion to dismiss into a motion for summary judgment and granted judgment to EOTech on all claims, concluding that the parties' Limitations Agreement validly shortened the time to sue. The Fourth Circuit affirmed as to the MFEPA claims, vacated as to the Title VII and ADEA claims, and remanded.

DISPOSITION

other

REMAND INSTRUCTIONS

Remand for further proceedings consistent with the opinion on Thomas's Title VII and ADEA claims; the MFEPA claims remain dismissed as time barred.

CASES CITED

- Edwards v. CSX Transp., Inc., 150 F.4th 232, 235 (4th Cir. 2025)
- Logan v. MGM Grand Detroit Casino, 939 F.3d 824, 826-39 (6th Cir. 2019)
- Thompson v. Fresh Prods., LLC, 985 F.3d 509, 520-21 (6th Cir. 2021)
- EEOC v. Commercial Off. Prods. Co., 486 U.S. 107, 110, 124 (1988)
- Occidental Life Ins. Co. of Cal. v. EEOC, 432 U.S. 355, 366-68, 372-73 (1977)
- Federal Express Corp. v. Holowecki, 552 U.S. 389, 400, 402-03 (2008)
- Cotton Yarn Antitrust Litigation, 505 F.3d 274, 277-93 (4th Cir. 2007)
- Bracey v. Lancaster Foods, LLC, 838 F. App'x 745, 746 (4th Cir. 2020)
- Moses H. Cone Mem'l Hosp. v. Mercury Constr. Corp., 460 U.S. 1, 24 (1983)
- Atlantic Coast Line R.R. Co. v. Pope, 119 F.2d 39, 40-44 (4th Cir. 1941)
- Cohens v. Virginia, 19 U.S. (6 Wheat.) 264, 399 (1821)
- Illinois v. Lidster, 540 U.S. 419, 424 (2004)
- Felder v. Casey, 487 U.S. 131, 134 (1988)
- Samantar v. Yousuf, 560 U.S. 305, 319 (2010)
- Arizona v. United States, 567 U.S. 387, 399-400 (2012)
- Guaranty Tr. Co. of N.Y. v. York, 326 U.S. 99, 110 (1945)
- Ceccone v. Carroll Home Servs., 165 A.3d 475, 482-85 (Md. 2017)
- Grayson O Co. v. Agadir Int'l LLC, 856 F.2d 307, 316 (4th Cir. 1988)
- Davis v. Mills, 194 U.S. 451, 454 (1904)