

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF  
CALIFORNIA

Doyle v. Optum Services, Inc.

Case No. 25-cv-0575-MMA-KSC (S.D. Cal. May 27, 2025) · No. 25-cv-0575-MMA-KSC · Decided May 27, 2025

SUMMARY

The United States District Court for the Southern District of California denied Plaintiff Erin Kathleen Doyle’s motion to remand her disability discrimination and wrongful termination action to state court. The court held that diversity jurisdiction existed because Defendants established by a preponderance of the evidence that the amount in controversy exceeded \$75,000 based on potential lost wages alone.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                       |
|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Southern District of California                                                                                                                                                                                                                                  |
| WRITING FOR THE COURT | Michael M. Anello                                                                                                                                                                                                                                                                                     |
| JURISDICTION          | United States District Court for the Southern District of California                                                                                                                                                                                                                                  |
| DECIDED               | May 27, 2025                                                                                                                                                                                                                                                                                          |
| DOCKET                | 25-cv-0575-MMA-KSC                                                                                                                                                                                                                                                                                    |
| DISPOSITION           | other                                                                                                                                                                                                                                                                                                 |
| PROCEDURAL POSTURE    | Plaintiff moved to remand an employment-discrimination action removed from California state court on diversity-jurisdiction grounds, arguing that the amount in controversy did not exceed \$75,000.                                                                                                  |
| STANDARD OF REVIEW    | The removing party bears the burden of establishing federal jurisdiction by a preponderance of the evidence when the state-court complaint is ambiguous as to the amount in controversy. The court considers the removal petition and summary-judgment-type evidence existing at the time of removal. |
| PRECEDENTIAL VALUE    | unpublished district court order                                                                                                                                                                                                                                                                      |
| PARTIES               | Erin Kathleen Doyle v. Optum Services, Inc., UnitedHealth Group, Inc.                                                                                                                                                                                                                                 |

TOPICS

- subject matter jurisdiction
- civil procedure
- ada / disability
- disability discrimination

## PRACTICE AREAS

civil procedure

federal jurisdiction

employment discrimination

disability discrimination

## QUESTIONS PRESENTED

1. Whether the federal court had diversity jurisdiction under 28 U.S.C. § 1332 because the amount in controversy exceeded \$75,000.
2. Whether Defendants established by a preponderance of the evidence that Plaintiff's lost past wages alone exceeded the jurisdictional amount.

## HOLDINGS

1. The amount in controversy exceeded \$75,000 because Defendants established that Plaintiff's claim for lost past wages was approximately \$84,073.60.
2. Remand was not warranted because diversity jurisdiction was proper.

## KEY QUOTATIONS

*"Federal courts are courts of limited jurisdiction."* (2)

*"Conclusory allegations as to the amount in controversy are insufficient."* (3)

## FACTUAL BACKGROUND

Plaintiff was formerly employed by Defendants and alleged disability discrimination, failure to accommodate, failure to engage in the interactive process, retaliation, and wrongful termination. She alleged that after injuries, a request for ergonomic equipment, and a leave of absence, she informed a supervisor that she was ready to resume her regular duties but was terminated. Defendants asserted that her lost wages alone placed more than \$75,000 in controversy, based on a full-time wage rate of \$20.21 per hour.

## PROCEDURAL HISTORY

Plaintiff filed the action in the Superior Court of the State of California, County of San Diego, on January 3, 2025. Defendants removed the action to the Southern District of California on March 11, 2025. Plaintiff moved to remand, and the district court denied the motion after considering the papers without oral argument.

## DISPOSITION

other

## CASES CITED

- Kokkonen v. Guardian Life Ins. Co. of Am., 511 U.S. 375, 377 (1994)
- Stock W., Inc. v. Confederated Tribes, 873 F.2d 1221, 1225 (9th Cir. 1989)
- California ex rel. Younger v. Andrus, 608 F.2d 1247, 1249 (9th Cir. 1979)
- McNutt v. Gen. Motors Acceptance Corp., 298 U.S. 178, 182-83 (1936)

- Gaus v. Miles, Inc., 980 F.2d 564, 566 (9th Cir. 1992)
- Libhart v. Santa Monica Dairy Co., 592 F.2d 1062, 1064 (9th Cir. 1979)
- Guglielmino v. McKee Foods Corp., 506 F.3d 696, 699-700 (9th Cir. 2007)
- Sanchez v. Monumental Life Ins. Co., 102 F.3d 989, 404 (9th Cir. 1996)
- Matheson v. Progressive Specialty Ins. Co., 319 F.3d 1089, 1090-91 (9th Cir. 2003)
- Davis v. Los Angeles Unified Sch. Dist. Pers. Com., 62 Cal. Rptr. 3d 69, 76-77 (Cal. Ct. App. 2007)
- Lisec v. United Airlines, Inc., 11 Cal. Rptr. 2d 689, 692 (Cal. Ct. App. 1991)
- Canova v. NLRB, 708 F.2d 1498, 1505 (9th Cir. 1983)
- Reese v. Daikin Comfort Tech. Distrib., Inc., 729 F. Supp. 3d 980, 987 (C.D. Cal. 2024)
- Andrade v. Arby's Rest. Grp., Inc., 225 F. Supp. 3d 1115, 1139-40 (N.D. Cal. 2016)