

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

Redd-Oyedele v. Santa Clara County Office of Education

Redd-Oyedele · No. 22-cv-02128-EJD · Decided March 14, 2025

SUMMARY

The United States District Court for the Northern District of California partially granted and partially denied defendants’ motion to dismiss an employment discrimination action brought under Title VII, the Fourteenth Amendment, FEHA, 42 U.S.C. § 1983, and 42 U.S.C. § 1985(3). The court dismissed the FEHA claim against the Santa Clara County Office of Education with prejudice on Eleventh Amendment immunity grounds, while allowing the other claims to proceed. The court terminated the motion to strike as moot.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Edward J. Davila
JURISDICTION	United States District Court for the Northern District of California
DECIDED	March 14, 2025
DOCKET	22-cv-02128-EJD
DISPOSITION	other
PROCEDURAL POSTURE	Defendants moved under Federal Rule of Civil Procedure 12(b)(6) to dismiss the Second Amended Complaint and separately moved to strike its third count.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts factual allegations as true and construes the pleading in the light most favorable to the nonmoving party, but need not accept legal conclusions couched as factual allegations. The complaint must contain sufficient factual matter to state a claim that is plausible on its face. Pro se pleadings receive a less stringent construction but must provide defendants with minimum notice of the alleged wrongdoing.
PRECEDENTIAL VALUE	District court order; precedential status unknown

TOPICS

- employment discrimination
- racial discrimination
- title vii
- section 1983
- motions to dismiss

PRACTICE AREAS

employment discrimination

civil rights

constitutional law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the Second Amended Complaint sufficiently alleged ongoing violations of federal law and prospective relief to invoke the Ex parte Young exception to Eleventh Amendment immunity against the individual defendants in their official capacities.
2. Whether California's Eleventh Amendment immunity barred Plaintiff's FEHA claim against the Santa Clara County Office of Education in federal court.
3. Whether the Second Amended Complaint adequately pleaded conspiracy claims under 42 U.S.C. §§ 1983 and 1985(3).
4. Whether the motion to strike the newly added FEHA count should be decided after that count was dismissed.

HOLDINGS

1. The Second Amended Complaint sufficiently alleged an ongoing violation of federal law and sought prospective injunctive relief, so the Ex parte Young exception permitted the official-capacity claims in counts two, four, and five to proceed past the pleading stage.
2. The FEHA claim against the Santa Clara County Office of Education was barred by Eleventh Amendment immunity because California had not waived its immunity to FEHA suits in federal court.
3. The Second Amended Complaint adequately pleaded conspiracy claims under 42 U.S.C. §§ 1983 and 1985(3), and counts four and five survived the motion to dismiss.

KEY QUOTATIONS

“Assuming all facts to be true and viewing these allegations in the light most favorable to Plaintiff, the Court finds that Plaintiff has now sufficiently alleged ongoing conduct.” (at 7)

“Therefore, the Court DENIES Defendants’ motion to dismiss counts four and five.” (at 13)

“Plaintiff may proceed with counts one, two, four, and five. Count three is dismissed with prejudice.” (at 13)

FACTUAL BACKGROUND

Plaintiff, an African American or Black employee of the Santa Clara County Office of Education, alleged that defendants repeatedly rejected her promotion applications and instead promoted less-qualified white or fair-skinned candidates. She alleged that two SCCOE employees, acting in their official capacities, maintained an ongoing practice of manipulating or disregarding Merit System Rules to favor white candidates. She further alleged that the employees agreed between May and August 2021 to exclude Black employees from promotions and implemented that agreement by promoting a white candidate to two positions for which Plaintiff had applied.

PROCEDURAL HISTORY

Plaintiff previously amended her complaint after the court granted two earlier motions to dismiss with leave to amend certain claims. In the Second Amended Complaint, she asserted Title VII, Fourteenth Amendment, FEHA, 42 U.S.C. § 1983 conspiracy, and 42 U.S.C. § 1985(3) conspiracy claims. The court granted the motion to dismiss in part, denied it in part, dismissed the FEHA claim with prejudice, allowed the other four counts to proceed, and terminated the motion to strike as moot.

DISPOSITION

other

CASES CITED

- Maney v. Brown, 91 F.4th 1296, 1302 (9th Cir. 2024)
- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 570 (2007)
- Manzarek v. St. Paul Fire & Marine Ins. Co., 519 F.3d 1025, 1031 (9th Cir. 2008)
- Erickson v. Pardus, 551 U.S. 89 (2007)
- Estelle v. Gamble, 429 U.S. 97, 106 (1976)
- Brazil v. U.S. Dep't of Navy, 66 F.3d 193, 199 (9th Cir. 1995)
- Lopez v. Smith, 203 F.3d 1122, 1127 (9th Cir. 2000) (en banc)
- Ex parte Young, 209 U.S. 123, 149-56 (1908)
- Arizona Students' Ass'n v. Arizona Bd. of Regents, 824 F.3d 858, 865 (9th Cir. 2016)
- Verizon Md., Inc. v. Public Serv. Comm'n of Md., 535 U.S. 635, 645 (2002)
- Riley's Am. Heritage Farms v. Elsasser, 32 F.4th 707, 724 (9th Cir. 2022)
- Sato v. Orange Cnty. Dep't of Educ., 861 F.3d 923, 934 (9th Cir. 2017)
- Avalos v. Baca, 596 F.3d 583, 592 (9th Cir. 2010)
- I.H. by & through Hunter v. Oakland Sch. for Arts, 234 F. Supp. 3d 987, 994 (N.D. Cal. 2017)
- Addisu v. Fred Meyer, Inc., 198 F.3d 1130, 1141 (9th Cir. 2000)