

UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT

Scott W. Williams v. Addison Community Schools; Josh Perry;
Michael Murphy; Jennifer Frost; Andrea Woodring; Kim Ford;
Steve Guerra

Williams v. Addison Cmty. Schs. · No. 25-1205 · Decided March 2, 2026

SUMMARY

The Sixth Circuit held that the district court abused its discretion by exercising supplemental jurisdiction over Scott Williams’s Michigan constitutional Fair and Just Treatment claim after dismissing all federal claims. Because the state constitutional claim presented novel and complex issues and implicated federal-state comity, the court vacated the judgment as to that claim and related respondeat superior liability and remanded for dismissal without prejudice. The court declined to address other state claims that Williams abandoned on appeal.

CASE DETAILS

COURT	United States Court of Appeals for the Sixth Circuit
WRITING FOR THE COURT	Stephanie Dawkins Davis; Julia Smith Gibbons; Jane Branstetter Stranch
JURISDICTION	United States Court of Appeals for the Sixth Circuit
DECIDED	March 2, 2026
DOCKET	25-1205
DISPOSITION	vacated
PROCEDURAL POSTURE	Appeal from the district court's denial of Williams's partial motion for summary judgment and grant of defendants' motion for summary judgment on his Michigan constitutional Fair and Just Treatment claim and related respondeat superior theory.
STANDARD OF REVIEW	The court reviewed the district court's decision to exercise supplemental jurisdiction for abuse of discretion.
PRECEDENTIAL VALUE	Published Sixth Circuit opinion; precedential.
PARTIES	Scott W. Williams v. Addison Community Schools, Josh Perry, Michael Murphy, Jennifer Frost, Andrea Woodring, Kim Ford, Steve Guerra

TOPICS

appellate procedure

civil procedure

standard of review

constitutional law

municipal law

PRACTICE AREAS

Civil procedure

Appellate procedure

Constitutional law

Civil rights

Municipal law

QUESTIONS PRESENTED

1. Whether the district court abused its discretion by exercising supplemental jurisdiction over Williams's novel and complex Michigan constitutional Fair and Just Treatment claim and related respondeat superior theory after dismissing all federal claims.
2. Whether the appellate court should address Williams's other state constitutional claims when he abandoned them on appeal.

HOLDINGS

1. The district court abused its discretion by exercising supplemental jurisdiction over Williams's Fair and Just Treatment claim and related respondeat superior theory because the federal claims had been dismissed and the remaining claims presented novel and complex questions concerning an unresolved provision of the Michigan Constitution, making comity and the other § 1367(c) considerations favor dismissal.
2. The court would not consider Williams's other state claims because he expressly abandoned them on appeal.

KEY QUOTATIONS

“But the district court’s discretion is not limitless and “is bounded by constitutional and prudential limits on the use of federal judicial power.”” (5)

“For the reasons stated, we VACATE and REMAND with instructions for the district court to dismiss without prejudice Williams’s Fair and Just Treatment claim and related assertion of respondeat superior liability.” (8)

FACTUAL BACKGROUND

Scott Williams was elected to the Addison Community School Board and was unanimously selected as its president for a one-year term. After a dispute during a board meeting and complaints about Williams's conduct, board members prepared a resolution seeking to censure him and remove him as president. Williams received no advance notice of the specific allegations, attended a closed meeting with a representative, and was removed by board vote. He then sued, including a claim under the Fair and Just Treatment clause of the Michigan Constitution.

PROCEDURAL HISTORY

Williams sued Addison Community Schools and individual school-board defendants, asserting federal and Michigan constitutional claims arising from his removal as school-board president. The district court dismissed

the federal claims, exercised supplemental jurisdiction over the state claims, and granted defendants summary judgment on all claims while denying Williams's partial summary-judgment motion. Williams appealed only the disposition of his Fair and Just Treatment claim and related respondeat superior theory. The Sixth Circuit vacated and remanded with instructions to dismiss those claims without prejudice.

DISPOSITION

vacated

REMAND INSTRUCTIONS

The district court must dismiss without prejudice Williams's Fair and Just Treatment claim and related assertion of respondeat superior liability.

CASES CITED

- Cleary v. News Corp., 30 F.3d 1255, 1258 (9th Cir. 1994)
- Mobley v. Tarlini, 641 F. Supp. 2d 430, 434 n.2 (E.D. Pa. 2009)
- Faber v. Ciox Health, LLC, 944 F.3d 593, 601 (6th Cir. 2019)
- Grubbs v. Sheakley Group, Inc., 807 F.3d 785, 806 (6th Cir. 2015)
- Blakely v. United States, 276 F.3d 853, 863 (6th Cir. 2002)
- Gamel v. City of Cincinnati, 625 F.3d 949, 951 (6th Cir. 2010)
- Landefeld v. Marion General Hospital, Inc., 994 F.2d 1178, 1182 (6th Cir. 1993)
- Robert N. Clemens Trust v. Morgan Stanley DW, Inc., 485 F.3d 840, 853 (6th Cir. 2007)
- Kowall v. Benson, 18 F.4th 542, 549 (6th Cir. 2021)
- Brown v. Cassens Transportation Co., 546 F.3d 347, 363 (6th Cir. 2008)
- Moon v. Harrison Piping Supply, 465 F.3d 719, 728 (6th Cir. 2006)
- Stanley v. Western Michigan University, 105 F.4th 856, 866-67 (6th Cir. 2024)
- Varsity Brands, Inc. v. Star Athletica, LLC, 799 F.3d 468, 493 (6th Cir. 2015)
- Hucul Advertising, LLC v. Charter Township of Gaines, 748 F.3d 273, 281 (6th Cir. 2014)
- Veneklasė v. Bridgewater Condominiums, L.C., 670 F.3d 705, 716 (6th Cir. 2012)
- Shearson v. Holder, 725 F.3d 588, 593 n.1 (6th Cir. 2013)
- Lipman v. Budish, 974 F.3d 726, 747 n.10 (6th Cir. 2020)

OPINION

Scott Williams v. Addison Cmty. Schs.

PER CURIAM.

RECOMMENDED FOR PUBLICATION

Pursuant to Sixth Circuit I.O.P. 32.1(b) File Name: 26a0058p.06

UNITED STATES COURT OF APPEALS

FOR THE SIXTH CIRCUIT

SCOTT W. WILLIAMS,

| Plaintiff-Appellant, | > No. 25-1205 | v. | |

ADDISON COMMUNITY SCHOOLS; JOSH PERRY; |

MICHAEL MURPHY; JENNIFER FROST; ANDREA |

WOODRING; KIM FORD; STEVE GUERRA, |

Defendants-Appellees. | ¹ Appeal from the United States District Court for the Eastern District of Michigan at Detroit. No. 2:22-cv-12742—Brandy R McMillion, District Judge. Argued: December 10, 2025 Decided and Filed: March 2, 2026 Before: GIBBONS, STRANCH, and DAVIS, Circuit Judges. _____

COUNSEL

ARGUED: Jeffrey L. Herron, HERRON LAW GROUP, Detroit, Michigan, for Appellant. Gregory W. Mair, O’NEILL, WALLACE & DOYLE, P.C., Saginaw, Michigan, for Appellees. ON BRIEF: Jeffrey L. Herron, HERRON LAW GROUP, Detroit, Michigan, for Appellant. Gregory W. Mair, O’NEILL, WALLACE & DOYLE, P.C., Saginaw, Michigan, for Appellees. _____

OPINION

_____ DAVIS, Circuit Judge. Scott Williams filed this action against Addison Community Schools and the then-superintendent of the School District plus five members of the School Board in their individual and official capacities. On appeal, Williams challenges the district No. 25-1205 Williams v. Addison Cmty. Schs., et al. Page 2 court’s denial of his partial motion for summary judgment as to his constitutional tort claim under the Fair and Just Treatment clause of the Michigan constitution, and he challenges its grant of Defendants’ motion for summary judgment as to that same claim. For the reasons stated below, we vacate the district court’s decision and remand. I. Scott Williams was elected to the Addison Community School Board (the “Board”) in November 2020 for a term of six years beginning in January 2021 and ending in January 2027. At all relevant times, Defendants Joshua Perry, Michael Murphy, Jennifer Frost, Andrea Woodring, and Kim Ford were also members of the Board. In January 2022, the Board unanimously chose Williams to serve as Board president for a one-year term. The Board is governed by bylaws. Those bylaws specify that officers, including the president, “shall serve for one (1) year and until their respective successors are elected” and “may be removed for cause by a majority vote of the full Board.” (Defs.’ Mot. Summ. J., Ex. 2, R. 36-3, PageID 352). The bylaws also provide that “[t]he parliamentary authority governing the Board of Education shall be Robert’s Rules of Order.”¹ (Pl.’s Am. Mot. Partial Summ. J., Ex. 2, R. 39-3, PageID 1027). On March 28, 2022, Williams and Wendy Rokita, the district’s chief financial officer, had a verbal dispute during an open-session Board meeting. After this meeting, Rokita approached Perry and shared her concerns about Williams’s conduct and professionalism, specifically that Williams was harassing and intimidating her and other staff and had requested confidential information. Shortly afterward, Perry began an investigation of Williams. Murphy and Perry subsequently prepared a

resolution for the Board's consideration, in which they alleged that Williams submitted improper requests for student information, took unauthorized actions, and harassed staff and the superintendent, in violation of the Board's bylaws. The resolution sought to censure Williams and remove him from his role as president. 1Robert's Rules of Order ("Robert's Rules") is "one of the leading sources of parliamentary law in the United States." *Cleary v. News Corp.*, 30 F.3d 1255, 1258 (9th Cir. 1994); see *Mobley v. Tarlini*, 641 F. Supp. 2d 430, 434 n.2 (E.D. Pa. 2009) (explaining that Robert's Rules "is a parliamentary manual whose provisions govern legislative bodies and other deliberative assemblies"). No. 25-1205 Williams v. Addison Cmty. Schs., et al. Page 3 On April 8, 2022, Superintendent Steve Guerra emailed the Board to schedule a special meeting to address the removal of an officer. Guerra's email indicated that he was acting on the request of two Board members, and the message did not specify which officer might be removed or the basis for any such removal. From conversations with Guerra, Williams learned that he was the officer that the Board members sought to remove. On April 25, 2022, the Board met to discuss Murphy and Perry's resolution. No one informed Williams before the meeting what allegations, if any, might be raised against him. He learned about the specific allegations only after the meeting was in process. At Williams's request, the meeting proceeded in closed session. And Williams's niece, who according to Williams is a law school graduate but not a practicing lawyer, accompanied him as his representative. At the end of the meeting, the Board voted to adopt the resolution in full and removed Williams from his position as president. Williams brought this action, alleging due process violations under the United States and Michigan constitutions and state constitutional torts under the Free Speech and Fair and Just Treatment clauses of the Michigan Constitution.² And he argued that Addison Community Schools (the "District") is subject to respondeat superior liability for the state constitutional violations. Defendants moved for summary judgment on all counts, and Williams moved for partial summary judgment on his state Fair and Just Treatment claim. The district court granted Defendants' motion in its entirety and denied Williams's motion. After dismissing Williams's federal due process claim, the district court exercised supplemental jurisdiction to also dismiss Williams's state claims. Williams now appeals (1) the district court's denial of his partial motion for summary judgment on his Fair and Just Treatment claim and (2) the district court's grant of Defendants' motion for summary judgment on only his Fair and Just Treatment claim, including respondeat superior liability against the District. 2The parties stipulated to the dismissal of Williams's due process claims for violation of his liberty interest (Counts II and IV), with prejudice, under the U.S. and Michigan constitutions. No. 25-1205 Williams v. Addison Cmty. Schs., et al. Page 4 II. We review a district court's decision to exercise supplemental jurisdiction for abuse of discretion. *Grubbs v. Sheakley Grp., Inc.*, 807 F.3d 785, 806 (6th Cir. 2015). III. This case comes to us in a relatively rare procedural posture. The district court dismissed all of Williams's claims—both federal and state—on the merits. To do so, the court exercised supplemental jurisdiction over Williams's state law claims after disposing of the federal claims. Williams has chosen to appeal only the district court's

disposition of a single state law claim, arising under Michigan's constitution. As it happens, Michigan has not yet spoken to the question of whether a private right of action exists for claims brought under the Fair and Just Treatment clause of the Michigan constitution. So, just as the district court was, we are left to make our best prediction of how the Michigan Supreme Court would answer this question. *Faber v. Ciox Health, LLC*, 944 F.3d 593, 601 (6th Cir. 2019). But as an initial matter, although the parties contest the merits of the district court's decision, we consider whether the exercise of supplemental jurisdiction is appropriate under the circumstances of this case. And we conclude that it is not. A district court retains supplemental jurisdiction over all state-law claims that "form part of the same case or controversy" as the claims over which the court has original jurisdiction. 28 U.S.C. § 1367(a). The district court, however, may decline to exercise supplemental jurisdiction if:

(1) the claim raises a novel or complex issue of State law,

(2) the claim substantially predominates over the claim or claims over which the district court has original jurisdiction,

(3) the district court has dismissed all claims over which it has original jurisdiction, or

(4) in exceptional circumstances, there are other compelling reasons for declining

jurisdiction. *Id.* § 1367(c). To be clear, under § 1367(c), "a district court may, not must, decline to exercise supplemental jurisdiction" where the outlined scenarios exist. *Blakely v. United States*, 276 F.3d No. 25-1205 *Williams v. Addison Cmty. Schs., et al.* Page 5 853, 863 (6th Cir. 2002). But the district court's discretion is not limitless and "is bounded by constitutional and prudential limits on the use of federal judicial power." *Stanley v. W. Mich. Univ.*, 105 F.4th 856, 866 (6th Cir. 2024) (citation omitted). In determining whether to exercise supplemental jurisdiction, the district court should balance several factors, including judicial economy, convenience, fairness, and comity. *Gamel v. City of Cincinnati*, 625 F.3d 949, 951 (6th Cir. 2010); see *Landefeld v. Marion Gen. Hosp., Inc.*, 994 F.2d 1178, 1182 (6th Cir. 1993) (explaining that the district court should weigh "the interests of judicial economy and the avoidance of multiplicity of litigation" against "needlessly deciding state law issues"). Because the district court here had original jurisdiction over Williams's federal claims, § 1367(a) empowered the district court to exercise supplemental jurisdiction over the state law claims. See *Robert N. Clemens Tr. v. Morgan Stanley DW, Inc.*, 485 F.3d 840, 853 (6th Cir. 2007). These claims, like the federal claims, were centered on Williams's removal from his position as president of the Board. Thus, the underlying facts formed part of the same case or controversy. Nonetheless, prudential concerns in this case lead us to question whether exercising supplemental jurisdiction was a proper exercise of discretion. Because most of the circumstances contemplated by § 1367(c) are present here, we hold that it was not.³ First, Williams's Fair and Just Treatment claim and related theory of respondeat superior liability raise novel or complex issues of state law. The Fair and Just Treatment clause of the Michigan Constitution provides that "[t]he right of all individuals, firms, corporations and voluntary

associations to fair and just treatment in the course of legislative and executive investigations and hearings shall not be infringed.” Mich. Const. Art. I, § 17. Few Michigan cases analyze this clause, and the most extensive discussion of the provision appears in an unpublished Michigan Court of Appeals decision. Indeed, the parties acknowledge the limited case law addressing the Fair and Just Treatment clause. And Williams specifically requested that the case be heard because it raises unresolved issues of state law. As it regards the plain language, the Michigan Constitution does not define “legislative” or “executive” as used in the Fair and Just Treatment clause. And the Michigan Supreme Court has not previously construed 3The second situation under § 1367(c) (i.e., whether the state-law claim substantially predominates over the federal claims) does not apply here. No. 25-1205 Williams v. Addison Cmty. Schs., et al. Page 6 the meaning of legislative or executive as used in this clause. Resolving Williams’s claim thus requires interpreting in the first instance a provision of the Michigan Constitution. And, without the benefit of an analogous clause under the United States Constitution, we are unable to draw from federal law interpretations in construing its meaning. In Kowall v. Benson, 18 F.4th 542 (6th Cir. 2021), we held that the district court should have declined to exercise supplemental jurisdiction over state law claims where the district court dismissed the federal claims and “the parties raise[d] novel questions of state constitutional law,” which we determined “are best left for state courts to answer in the first instance.” Id. at 549 (citing Brown v. Cassens Transp. Co., 546 F.3d 347, 363 (6th Cir. 2008)). In Brown, we likewise held that the district court abused its discretion in deciding Michigan intentional infliction of emotional distress (“IIED”) claims after dismissing the federal claims. There, we observed that “the interests of judicial economy and the avoidance of multiplicity of litigation did not trump the interest in needlessly deciding state law issues.” 546 F.3d at 363 (citation modified). And even though the district court in Brown believed that resolution of the IIED claims was necessary to its determination of some of the federal claims, we determined that this mistaken belief did not justify the exercise of supplemental jurisdiction. Similarly, in Moon v. Harrison Piping Supply, we concluded that the district court’s exercise of supplemental jurisdiction was improper because the state IIED claims “implicate[d] complex aspects of Michigan law.” 465 F.3d 719, 728 (6th Cir. 2006). Considering the caution we expressed in Brown and Moon about exercising supplemental jurisdiction to decide novel state tort law claims, it seems axiomatic that construing a unique provision of Michigan’s constitution would qualify as sufficiently complex to warrant restraint in employing supplemental jurisdiction. Here, the district court granted summary judgment to Defendants on Williams’s 42 U.S.C. § 1983 claims. So this fact weighed in favor of declining supplemental jurisdiction over the remaining state law claims. See Stanley, 105 F.4th at 867 (explaining that “[w]hen all federal claims are dismissed before trial, the balance of considerations usually will point to dismissing the state law claims” (citation omitted)). True, the district court is not required to dismiss the state law claims after dismissing all the federal claims. Varsity Brands, Inc. v. Star No. 25-1205 Williams v. Addison Cmty. Schs., et al. Page 7 Athletica, LLC, 799 F.3d 468, 493 (6th Cir. 2015). But the combination of the dismissal of all federal claims and the novelty

and complexity of the remaining state claims strongly supported declining the exercise of supplemental jurisdiction in this case. Finally, this case presents exceptional circumstances that raise other compelling reasons for declining jurisdiction. As discussed, there is no federal analogue for Michigan's Fair and Just Treatment clause. Nor does Michigan have a statute like § 1983, which creates a federal right of action for certain violations of the United States Constitution and federal laws. So concerns around federal-state comity counsel that we abstain from needlessly intruding into significant state matters, such as the interpretation in the first instance of unique provisions of the state's constitution. See *Kowall*, 18 F.4th at 549. Although efficiency considerations weigh in favor of the exercise of supplemental jurisdiction, those interests do not outweigh the comity interests here. Again, the circumstances of this case are relatively rare; in the run-of-mine case, state claims that remain after all federal claims have been resolved will involve questions that are neither novel nor complex. And even less frequently will they involve novel and complex questions arising from a state's constitution. But because this case presents just such a rarely occurring circumstance, it was not a proper exercise of discretion to take on Williams's Michigan Fair and Just Treatment claim and related theory of respondeat superior liability. That said, we reiterate that a district court does not abuse its discretion in exercising supplemental jurisdiction where none of the circumstances under § 1367(c) exists. See *Hucul Advert., LLC v. Charter Twp. of Gaines*, 748 F.3d 273, 281 (6th Cir. 2014). And indeed, "the default assumption is that the court will exercise supplemental jurisdiction over all related claims." *Veneklase v. Bridgewater Condos, L.C.*, 670 F.3d 705, 716 (6th Cir. 2012). In other words, a district court must ordinarily exercise supplemental jurisdiction over all related state claims and should only decline to do so, in its discretion, for one or more of the reasons enumerated in § 1367(c). And even where a § 1367(c) circumstance applies, a district court does not necessarily abuse its discretion by exercising supplemental jurisdiction; in evaluating whether to do so, the district court should still consider and weigh judicial economy, convenience, fairness, and comity. See *Gamel*, 625 F.3d at 951. As such, district courts should No. 25-1205 *Williams v. Addison Cmty. Schs., et al.* Page 8 not read this opinion to restrict their broad discretion to exercise supplemental jurisdiction, as our holding here is narrowly tailored given the specific factual circumstances of this case. IV. At oral argument, Williams requested that if we vacate the district court's decision to exercise supplemental jurisdiction, that we make clear that we are vacating the entire decision as to all state constitutional claims, including those not at issue in this appeal. But Williams expressly abandoned his other state claims on appeal, so we will not consider them now. See *Shearson v. Holder*, 725 F.3d 588, 593 n.1 (6th Cir. 2013) (declining to consider claim that plaintiff abandoned on appeal); *Lipman v. Budish*, 974 F.3d 726, 747 n.10 (6th Cir. 2020) (explaining that "claims raised in the district court but not briefed on appeal are abandoned" (citation omitted)). V. For the reasons stated, we VACATE and REMAND with instructions for the district court to dismiss without prejudice Williams's Fair and Just Treatment claim and related assertion of respondeat superior liability.

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