

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)