

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Blakney v. Medical Transportation Management, Inc.

Blakney · No. 25-cv-04339 (APM) · Decided April 15, 2026

SUMMARY

The United States District Court for the District of Columbia granted Medical Transportation Management, Inc.’s motion to dismiss Count One of James Blakney’s complaint. The court held that the plaintiff failed to plausibly plead a disparate-impact claim because he relied on national and regional arrest and incarceration statistics without alleging disparities in MTM’s workforce or among qualified applicants affected by the challenged convictions policy.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Amit P. Mehta
JURISDICTION	United States District Court for the District of Columbia
DECIDED	April 15, 2026
DOCKET	25-cv-04339 (APM)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendant Medical Transportation Management, Inc. moved to dismiss Count One under Federal Rule of Civil Procedure 12(b)(6); the court granted the motion.
STANDARD OF REVIEW	The court evaluated whether the complaint stated a plausible disparate-impact claim.
PRECEDENTIAL VALUE	Published district court order

TOPICS

- racial discrimination
- employment discrimination
- motions to dismiss
- pleadings
- civil procedure

PRACTICE AREAS

- employment law
- civil rights
- civil procedure

QUESTIONS PRESENTED

1. Whether the complaint plausibly pleaded a disparate-impact claim based solely on national and regional arrest and incarceration statistics without allegations connecting those statistics to MTM's qualified applicant or employee population.

HOLDINGS

1. A plaintiff does not plausibly state a disparate-impact claim by relying solely on general national or regional arrest and incarceration statistics; the pleading must allege facts connecting the asserted disparity to the employer's qualified applicant or employee population and the challenged policy.

KEY QUOTATIONS

“But “that is not a plausible—or, for that matter, logical—inference,” the court reasoned, so it affirmed the claim’s dismissal.” (at 2)

“Plaintiff’s pleading here suffers from the exact same deficiency.” (at 2)

FACTUAL BACKGROUND

Plaintiff alleged that MTM maintained a policy and practice of denying job opportunities to employees with certain criminal charges and convictions, which allegedly had a discriminatory effect on Black workers. He relied on national and regional statistics showing that African Americans are arrested and incarcerated at disproportionate rates relative to their share of the relevant populations. The complaint did not allege racial disparities in MTM's existing workforce or demographic information concerning qualified applicants whom MTM rejected or fired because of the policy.

PROCEDURAL HISTORY

Plaintiff filed a complaint alleging, among other things, a disparate-impact claim based on MTM's alleged policy of denying employment opportunities to persons with certain criminal charges or convictions. MTM moved to dismiss Count One. The district court granted the motion, concluding that the complaint did not plausibly connect national and regional arrest and incarceration statistics to MTM's qualified applicant or employee populations.

DISPOSITION

dismissed

CASES CITED

- Shanks v. International Union of Bricklayers and Allied Craftworkers, 134 F.4th 585 (D.C. Cir. 2025)
- Mandala v. NTT Data, Inc., 975 F.3d 202 (2d Cir. 2020)

OPINION

Blakney v. Medical Transportation Management, Inc.

PER CURIAM.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____))
JAMES BLAKNEY,)
) Plaintiff,)) v.) Case No. 25-cv-04339 (APM))
MEDICAL TRANSPORTATION)
MANAGEMENT, INC., et al.,)) Defendants.)
_____)

ORDER

Before the court is Defendant Medical Transportation Management, Inc.’s (“MTM”) Motion to Dismiss Count One, ECF No. 14. It is hereby granted. Little needs to be said to explain why. The D.C. Circuit in *Shanks v. International Union of Bricklayers and Allied Craftworkers*, 134 F.4th 585 (D.C. Cir. 2025), cited approvingly to the Second Circuit’s decision in *Mandala v. NTT Data, Inc.*, 975 F.3d 202 (2d Cir. 2020), to explain what a plaintiff must plead to establish a plausible disparate impact claim. *Shanks*, 134 F.4th at 592–94 (citing *Mandala*, 975 F.3d at 207, 209–10). *Mandala* is on all fours with this case. There, as here, the plaintiffs asserted that the employer’s “alleged policy not to hire persons with certain criminal convictions has a disproportionately large effect on African-American applicants.” 975 F.3d at 205; see Compl., ECF No. 1, ¶ 32 (“MTM’s policy and practice of denying job opportunities to employees with certain charges and convictions has a discriminatory effect on Black workers.”). The *Mandala* plaintiffs attempted to support their claim with statistics showing that “African Americans are arrested and incarcerated at higher rates than [w]hites, relative to their share of the national population.” 975 F.3d at 206 (internal quotation marks omitted). The plaintiffs did not, however, “provide [any] allegations to demonstrate that national arrest or incarceration statistics are in any way representative of the pool of potential applicants qualified for a position at [the employer].” *Id.* at 211. All they offered was “the conclusory and unsupported assertion that these figures are so stark that they must hold true for this (or any) segment of the population.” *Id.* But “that is not a plausible—or, for that matter, logical—inference,” the court reasoned, so it affirmed the claim’s dismissal. *Id.* Plaintiff’s pleading here suffers from the exact same deficiency. He relies solely on national and regional statistics showing that African Americans are arrested and incarcerated at disproportionate rates relative to their share of the relevant populations. See Compl. ¶¶ 34–38. But nowhere does he make allegations about “racial disparities in [MTM’s] existing workforce or the demographics of qualified applications that [MTM] has rejected [or fired] as a result of its [disqualifying convictions] policy.” 975 F.3d at 206. For that reason, just as in *Mandala*, Plaintiff fails to state a plausible claim of disparate impact. Count One is therefore dismissed. Dated: April 15, 2026
P. Mehta United States District Judge 2

