

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
ILLINOIS, EASTERN DIVISION

Tia Gooden v. Teamsters Local 705, et al.

Gooden · No. No. 25 CV 6907 · Decided April 3, 2026

SUMMARY

The United States District Court for the Northern District of Illinois granted Teamsters Local 705’s motion to dismiss Counts III and IV of Tia Gooden’s complaint. The court held that the plaintiff failed to allege sufficient factual matter supporting her claims for race discrimination and retaliation under 42 U.S.C. § 1981.

CASE DETAILS

COURT	United States District Court for the Northern District of Illinois, Eastern Division
WRITING FOR THE COURT	Jeremy C. Daniel
JURISDICTION	United States District Court for the Northern District of Illinois, Eastern Division
DECIDED	April 3, 2026
DOCKET	No. 25 CV 6907
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendant Teamsters Local 705 moved under Federal Rule of Civil Procedure 12(b)(6) to dismiss Counts III and IV of the amended complaint, which asserted race discrimination and retaliation claims under 42 U.S.C. § 1981. The court granted the motion.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded factual allegations as true and draws reasonable inferences in favor of the nonmoving party; dismissal is proper when the allegations, even if true, do not plausibly establish entitlement to relief.
PRECEDENTIAL VALUE	unpublished district court order

TOPICS

- motions to dismiss
- racial discrimination
- retaliation
- civil rights
- employment law

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Gooden stated a claim for race discrimination under 42 U.S.C. § 1981 against Teamsters Local 705.
2. Whether Gooden stated a claim for retaliation under 42 U.S.C. § 1981 based on Teamsters' handling of her grievances.

HOLDINGS

1. Gooden failed to state a § 1981 race-discrimination claim because she did not identify a collective bargaining agreement containing an applicable nondiscrimination clause and, even assuming such an agreement existed, offered only a conclusory allegation that similarly situated non-African American employees were treated differently.
2. Gooden failed to state a § 1981 retaliation claim because she did not allege sufficient facts showing that Teamsters refused to process her grievances because of her race or because of earlier complaints about race.

KEY QUOTATIONS

“A Rule 12(b)(6) motion tests whether the plaintiff has provided “enough factual information to state a claim to relief that is plausible on its face and has raised a right to relief above the speculative level.””

“Section 1981 prohibits discrimination in the making and enforcement of private contracts.”

“A § 1981 claim may be brought against a labor organization . . . when ‘the collective bargaining agreement contains an express clause binding both the employer and the union not to discriminate on racial grounds[.]’”

FACTUAL BACKGROUND

Gooden, an African American woman employed by DHL since 2020 and represented by Teamsters, alleged that her supervisor and coworkers harassed her between 2021 and 2024. She alleged that she filed grievances with Teamsters, which allegedly failed to adequately process them and closed them without her agreement. Her § 1981 claims against Teamsters relied on a conclusory allegation that similarly situated non-African American employees were treated differently, without identifying supporting facts or a collective bargaining agreement containing an applicable nondiscrimination clause.

PROCEDURAL HISTORY

Tia Gooden sued DHL Express USA and Teamsters Local 705, asserting Title VII claims against DHL and § 1981 claims against Teamsters. Teamsters moved to dismiss the § 1981 claims for failure to state a claim. The district court granted the motion and struck the scheduled motion hearing.

DISPOSITION

dismissed

CASES CITED

- Virnich v. Vorwald, 664 F.3d 206, 212 (7th Cir. 2011)
- Haywood v. Massage Envy Franchising, LLC, 887 F.3d 329, 333 (7th Cir. 2018)
- Camasta v. Jos. A. Bank Clothiers, Inc., 761 F.3d 732, 736 (7th Cir. 2014)
- Lax v. Mayorkas, 20 F.4th 1178, 1181 (7th Cir. 2021)
- Bell Atl. Corp. v. Twombly, 550 U.S. 544, 558 (2007)
- Majeske v. Fraternal Ord. of Police, Loc. Lodge No. 7, 94 F.3d 307, 312 (7th Cir. 1996)
- Patterson v. McLean Credit Union, 491 U.S. 164, 172 (1989)
- Daniels v. Pipefitters' Ass'n Loc. Union No. 597, 945 F.2d 906, 916 (7th Cir. 1991)
- Webb v. AFSCME Council 31, No. 19-cv-4192, 2020 WL 919260, at *2 (N.D. Ill. Feb. 26, 2020)
- Green v. Am. Fed'n of Tchrs./Ill. Fed. of Tchrs. Loc. 604, 740 F.3d 1104, 1107 (7th Cir. 2014)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/federal/united-states-district-court-for-the-northern-district-of-il/2026/tia-gooden-v-teamsters-local-705-et-al-zrn8tg6s>