Putz v. Hosp. Syracuse, Inc.

Docket No.: 25-1713

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Case Information

Court: U.S. Court of Appeals for the Second Circuit

Date Decided: October 2, 2026

Judges: Circuit Judge Wesley, Circuit Judge Sullivan, Circuit Judge Robinson

Lower Court: U.S. District Court for the Western District of New York (Judge Meredith A. Vacca)

Parties and Attorneys

Plaintiff-Appellant: Karen Putz; Represented By: Andrew Rozynski

Defendant-Appellee: Hospitality Syracuse, Inc., d.b.a. Taco Bell; Represented By: Claire G. Bopp, Jennifer M. Schwartzott

Overview

Issue: Whether the absence of threatened future discrimination required dismissal of injunctive claims without prejudice and justified dismissal of related damages claims.

Lower Court Held: The district court granted summary judgment, finding no need for an injunction on the federal public-accommodations claim and treating the remaining federal and state claims as contingent on that claim's viability.

What Was Overturned: The Second Circuit vacated the judgment and remanded for dismissal of the injunctive claims without prejudice and further consideration of the damages claims.

Why: The absence of likely future discrimination defeated standing for prospective relief but did not resolve claims seeking damages for past discrimination.

Background

Karen Putz, who is deaf, alleged that Hospitality Syracuse denied her service at a Taco Bell drive-through in Henrietta, New York. She sued under Title III of the Americans with Disabilities Act (ADA), 42 U.S.C. § 12181 et seq. [prohibiting disability discrimination in public accommodations]; the Rehabilitation Act (RA), 29 U.S.C. § 794 [prohibiting disability discrimination by federally funded programs]; the New York State Human Rights Law (NYSHRL), N.Y. Exec. Law § 290 et seq. [New York's anti-discrimination statute]; and the New York Civil Rights Law (NYCRL), N.Y. Civ. Rts. Law § 40 et seq. [New York's civil rights statute].

Lower Court Decision

The district court found injunctive relief unnecessary because Hospitality Syracuse had taken remedial measures. It dismissed the ADA claim with prejudice and treated the RA and state-law claims as dependent on the ADA claim's viability.

Second Circuit Reversal

Reviewing summary judgment and standing de novo, the Second Circuit found no reasonable inference of continuing discrimination given new signage, employee retraining, and subsequent successful accommodations. It directed dismissal without prejudice of the ADA and NYSHRL injunctive claims for lack of standing. Damages claims concerned past harm, not threatened recurrence. On remand, the district court must evaluate disputed factual issues on the RA, NYSHRL, and NYCRL damages claims and analyze the NYSHRL independently of federal law.

Legal Significance

This non-precedential summary order distinguishes standing for prospective relief from the viability of damages claims arising from the same incident. Remedial measures defeating a threatened-future-injury showing do not alone dispose of damages claims.

Key Takeaway

Analyze standing separately for each requested remedy; dismissal for lack of standing must be without prejudice.

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