

A plaintiff brought a class action in federal court against a nationwide grocery-store chain for violating a federal disability-rights statute that requires public buildings to be wheelchair-accessible. The plaintiff sought an injunction requiring the grocery chain to modify the entrances to its stores to comply with the statute. The plaintiff demanded a jury trial.

The statute is silent on the right to a jury trial. The grocery chain does not want a jury trial.

What is the grocery chain's strongest argument that the plaintiff is not entitled to a jury trial?

- A. Class actions are so complex as to be outside the jury's competence to decide.
- B. Disability-rights claims did not exist at common law when the Seventh Amendment was adopted.
- C. The remedy the plaintiff seeks is primarily equitable in nature.
- D. The statute is silent on the right to a jury trial.

## Explanation:

### Right to jury trial in civil case

- |                 |   |
|-----------------|---|
| <b>Right</b>    | <ul style="list-style-type: none"><li>• <b>Legal claim</b> – seeks monetary remedy to compensate for loss (eg, tort/contract damages)</li></ul>   |
| AND             |   |
| <b>No right</b> | <ul style="list-style-type: none"><li>• <b>&gt; \$20 in controversy</b></li><li>• <b>Equitable claim</b> – seeks nonmonetary remedy (eg, injunction, specific performance) since legal remedy is inadequate</li></ul> |
| OR              |   |
|                 | <ul style="list-style-type: none"><li>• <b>≤ \$20 in controversy</b></li></ul>  |

The Seventh Amendment guarantees the **right to a jury trial** in federal civil cases where the amount in controversy exceeds 20 dollars.\* This right **applies only to legal claims**—ie, claims that seek a **monetary remedy** to compensate for loss (eg, damages). It does **not apply to equitable claims**—ie, claims that seek a nonmonetary remedy (eg, injunction). Therefore, the grocery-store chain's strongest argument that the plaintiff is not entitled to a jury trial is that the injunction the plaintiff seeks is primarily equitable in nature.

\*The Seventh Amendment right to a jury trial does not apply to state civil cases because this right has never been incorporated against the states through the Fourteenth Amendment due process clause.

**(Choice A)** A jury is considered competent to decide class actions and other complex cases. As a result, the right to a jury trial cannot be defeated simply because the case is complex.

**(Choice B)** The right to a jury trial depends on the type of relief sought, not whether the asserted claim existed at common law when the Seventh Amendment was adopted.

**(Choice D)** The Seventh Amendment preserves the right to a jury trial in statutory actions that provide for claims analogous to claims tried at common law in which legal/monetary relief is sought. This is true even if the statute is silent on the right to a jury trial.

### Educational objective:

The Seventh Amendment right to a jury trial applies to federal civil cases when the amount in controversy exceeds 20 dollars and a party asserts a *legal* claim (ie, a claim seeking a monetary remedy). However, this right does not apply when a party asserts an *equitable* claim (ie, a claim seeking a nonmonetary remedy).

### References

- U.S. Const. amend. VII (right to a jury trial).
- Feltner v. Columbia Pictures Television, Inc., 523 U.S. 340, 347–48 (1998)  
(explaining that the Seventh Amendment right to a jury trial only applies in legal, not equitable, actions).

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