

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA

JAMES E. ENGSTROM and)
RICHARD SHAW,)
Plaintiffs,)
v.) No. 23-cv-0428
AIR LINE PILOTS ASSN, INT'L.)
and UNITED AIRLINES MASTER)
EXECUTIVE COUNCIL,) Filed: Nov. 11, 2023
Defendants)

COMPLAINT

3. Plaintiff James Engstrom (“Engstrom”) is a pilot employed by United Airlines.
4. Plaintiff Richard Shaw (“Shaw”) is a pilot employed by United Airlines.
5. Defendant Air Line Pilots Association, Intl (“ALPA”) is the labor union representing airlines for all U.S. carriers.
6. Defendant United Airlines Master Executive Council (“MEC”) is the ALPA chapter representing United Airlines pilot employees.

* * *

15. United required all employees, including pilots, to obtain a vaccination for COVID-19.
16. Engstrom has a sincere religious objection to the vaccine.
17. Shaw has a sincere religious objection to the vaccine.
18. Engstrom asked United for an accommodation to not have to take the vaccine, in light of his religious beliefs; the request was denied without explanation.
19. Shaw asked United for an accommodation to not have to take the vaccine, in light of his religious beliefs; the request was denied without explanation.
20. Following Engstrom’s refusal to take the vaccine, he incurred a range of adverse employment consequences, including loss of preference in selecting routes; loss of preference in selecting workdays; and suspension.
21. Following Shaw’s refusal to take the vaccine, he incurred a range of adverse employment consequences, including loss of preference in selecting routes; loss of preference in selecting workdays; and suspension.

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Count I: Florida Civil Rights Act (“FCRA”)
Disparate Treatment on Basis of Religion

Count II: Florida Civil Rights Act (“FCRA”)
Failure to Accommodate Religion

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA

JAMES E. ENGSTROM and)
RICHARD SHAW,)
Plaintiffs,)
v.) No. 23-cv-0428
AIR LINE PILOTS ASSN, INT’L.)
and UNITED AIRLINES, INC.,) Filed: Apr. 28, 2024
Defendants)

AMENDED COMPLAINT

* * *

3. Plaintiff James Engstrom (“Engstrom”) is a pilot employed by United Airlines.
4. Plaintiff Richard Shaw (“Shaw”) is a pilot employed by United Airlines.
5. Defendant Air Line Pilots Association, Intl (“ALPA”) is the labor union representing airlines for all U.S. carriers, including United Airlines.
6. Defendant United Airlines, Inc. (“United”) is a U.S.-based airline.

* * *

15. United required all employees, including pilots, to obtain a vaccination for COVID-19.
16. Engstrom has a sincere religious objection to the vaccine.
17. Shaw has a sincere religious objection to the vaccine.
18. Engstrom asked United for an accommodation to not have to take the vaccine, in light of his religious beliefs; the request was denied without explanation.
19. Shaw asked United for an accommodation to not have to take the vaccine, in light of his religious beliefs; the request was denied without explanation.
20. Following Engstrom’s refusal to take the vaccine, he incurred a range of adverse employment consequences, including loss of preference in selecting routes; loss of preference in selecting workdays; and suspension.
21. Following Shaw’s refusal to take the vaccine, he incurred a range of adverse employment consequences, including loss of preference in selecting routes; loss of preference in selecting workdays; and suspension.

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**Count I: Florida Civil Rights Act (“FCRA”)
(All Plaintiffs v. All Defendants)
Disparate Treatment on Basis of Religion**

**Count II: Florida Civil Rights Act (“FCRA”)
(All Plaintiffs v. All Defendants)
Failure to Accommodate Religion**

**Count III: Title VII of the Civil Rights Act of 1964
(All Plaintiffs v. ALPA)
Disparate Treatment on Basis of Religion**

**Count IV: Title VII of the Civil Rights Act of 1964
(All Plaintiffs v. ALPA)
Failure to Accommodate Religion**

**Count V: Intentional Infliction of Emotional Distress (Florida Law)
(All Plaintiffs v. All Defendants)**

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

JAMES E. ENGSTROM, et al.,)
 Plaintiffs,)
) No. 24-cv-0515
v.)
AIR LINE PILOTS ASSN, INT'L., et al.,)
 Defendants) Filed: Jan. 30, 2025

Order

Leave is granted to Plaintiffs to file a Seconded Amended Complaint. Plaintiffs shall file within 30 days.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

JAMES E. ENGSTROM and)
RICHARD SHAW,)
Plaintiffs,)
v.) No. 24-cv-0515
AIR LINE PILOTS ASSN, INT’L.)
and UNITED AIRLINES, INC.,) Filed: Feb. 28, 2025
Defendants)

SECOND AMENDED COMPLAINT

3. Plaintiff James Engstrom (“Engstrom”) is a pilot employed by United Airlines.
4. Plaintiff Richard Shaw (“Shaw”) is a pilot employed by United Airlines.
5. Defendant Air Line Pilots Association, Intl (“ALPA”) is the labor union representing airlines for all U.S. carriers, including United Airlines.
6. Defendant United Airlines, Inc. (“United”) is a U.S.-based airline.

* * *

15. United required all employees, including pilots, to obtain a vaccination for COVID-19.
16. Engstrom has a sincere religious objection to the vaccine.
17. Shaw has a sincere religious objection to the vaccine.
18. Engstrom asked United for an accommodation to not have to take the vaccine, in light of his religious beliefs; the request was denied without explanation.
19. Shaw asked United for an accommodation to not have to take the vaccine, in light of his religious beliefs; the request was denied without explanation.
20. Following Engstrom’s refusal to take the vaccine, he incurred a range of adverse employment consequences, including loss of preference in selecting routes; loss of preference in selecting workdays; and suspension.
21. Following Shaw’s refusal to take the vaccine, he incurred a range of adverse employment consequences, including loss of preference in selecting routes; loss of preference in selecting workdays; and suspension.

* * *

31. Plaintiffs received a right to sue letter from the Equal Employment Opportunity Commission (“EEOC”) with respect to a Title VII claim against United Airlines on December 20, 2024.

* * *

**Count I: Florida Civil Rights Act (“FCRA”)
(All Plaintiffs v. All Defendants)
Disparate Treatment on Basis of Religion**

**Count II: Florida Civil Rights Act (“FCRA”)
(All Plaintiffs v. All Defendants)
Failure to Accommodate Religion**

**Count III: Title VII of the Civil Rights Act of 1964
(All Plaintiffs v. ALPA)
Disparate Treatment on Basis of Religion**

**Count IV: Title VII of the Civil Rights Act of 1964
(All Plaintiffs v. ALPA)
Failure to Accommodate Religion**

**Count V: Intentional Infliction of Emotional Distress (Florida Law)
(All Plaintiffs v. All Defendants)**

3. Plaintiff James Engstrom (“Engstrom”) is a pilot employed by United Airlines.

4. Plaintiff Richard Shaw (“Shaw”) is a pilot employed by United Airlines.

5. Defendant United Airlines, Inc. (“United”) is a U.S.-based airline.

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18. Engstrom asked United for an accommodation to not have to take the vaccine, in light of his religious beliefs; the request was denied without explanation.

21. Shaw asked United for an accommodation to not have to take the vaccine, in light of his religious beliefs; the request was denied without explanation.

22. Following Engstrom’s refusal to take the vaccine, he incurred a range of adverse consequences, including loss of preference in selecting routes; loss of preference in selecting workdays; and suspension.

23. Following Shaw’s refusal to take the vaccine, he incurred a range of adverse consequences, including loss of preference in selecting routes; loss of preference in selecting workdays; and suspension.

* * *

31. Plaintiffs received a right to sue letter from the Equal Employment Opportunity Commission (“EEOC”) with respect to United Airlines on December 20, 2024.

* * *

Count I: Title VII of the Civil Rights Act of 1964
Disparate Treatment on Basis of Religion

Count II: Title VII of the Civil Rights Act of 1964
Failure to Accommodate Religion

