Supreme Court Rejects Alabama's Attempt to Use Administrative Delay to Immunize Itself from Due-Process Suits

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Williams v. Reed, 145 S. Ct. 465 (Feb. 21, 2025)

In *Williams v. Reed,* the U.S. Supreme Court addressed Alabama's application of its exhaustion-of-administrative-remedies requirement to 42 U.S.C. §1983 actions which challenge allegedly unlawful delays in that administrative process.

In Alabama, once a claimant applies for unemployment benefits, the Alabama Department of Labor must, by law (Ala. Code §25–4–91(a)), "promptly" decide the claim. The appeals process statute (Ala. Code §25–4–95) contains a similar expedited deadline, mandating that claimants cannot sue until their appeals have been decided.

Petitioners—unemployed workers—sued Alabama's Secretary of Labor under 42 U.S.C. § 1983 for unlawful delays in processing their benefits claims. The secretary argued that the petitioners' claims should be dismissed because they had not yet received a final decision concerning their benefits claims from the Department of Labor. According to the department, the petitioners had not complied with Alabama's exhaustion requirement.

The trial court agreed with the Department of Labor and dismissed the petitioners' complaint. The Alabama Supreme Court then affirmed on failure-to-exhaust grounds, reasoning that Section 1983 did not preempt Alabama's administrative exhaustion requirement. A split 5-4 Supreme Court reversed on narrow grounds.

Writing for the majority, Justice Kavanaugh found the lower courts' rulings "created a catch-22." Because unemployment benefit claimants could not sue until they completed the Department of Labor's process, they could *never* sue under Section 1983 to obtain an order expediting the department's process because there would

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no longer be a process to expedite. As such, this process effectively immunized state officials from Section 1983 challenges to allegedly unlawful delays in the administrative process.

This result violated longstanding precedent that a state law immunizing government conduct that would otherwise be subject to a Section 1983 suit is preempted, even when the suit takes place in state court.

The Secretary of Labor's attempts to separate its process from this precedent were unavailing. First, the secretary argued the jurisdictional nature of the exhaustion requirement set it apart from other rules that are preempted by Section 1983. The Supreme Court disagreed and found the jurisdictional label not dispositive. Despite states retaining "substantial leeway" to establish neutral jurisdictional rules, state laws that immunize defendants from Section 1983 liability in state court are preempted, notwithstanding their jurisdictional status.

Second, the Secretary of Labor argued that claimants could seek a writ of mandamus from state courts to compel the department to act quicker. The majority was not persuaded. Justice Kavanaugh noted that not only was it unclear if mandamus relief was available in unemployment benefits cases, but offering mandamus relief is another way of forcing claimants to go through a state hurdle before challenging delays in the administrative process under Section 1983.

The majority concluded that states may not immunize government defendants from Section 1983 due-process suits alleging unlawful delays in the administrative process for failure to exhaust that process. However, the Supreme Court limited its holding to only state court applications in this narrow context—it left open the question of whether both state and federal courts are barred from applying state administrative exhaustion requirements to Section 1983 claims more generally.

Justice Thomas, joined by Justices Alito, Gorsuch, and Barrett, dissented. They agreed with the lower courts and argued that the petitioners' complaint should have been dismissed for failure to complete the Department of Labor's process. According to the

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dissent, states have "unfettered discretion" on whether to provide a forum for Section 1983 claimants. Justice Thomas also claimed there were no preemption issues here. He argued that Section 1983 does not "command" states to provide a forum for Section 1983 claimants—rather, it merely "addresses who may sue and be sued for violations of federal law." And he noted that Alabama's exhaustion requirement did not implicitly conflict with Section 1983 because those plaintiffs that fail to exhaust their state remedies may sue in federal court.

Key Takeaways

- The Supreme Court clarified that state laws that completely immunize government officials from Section 1983 challenges to unlawful administrative delays in state court are unlawful.
- States may not force plaintiffs to exhaust their state administrative remedies before plaintiffs may sue under Section 1983 to challenge allegedly unlawful delays to the administrative process in state court.
- However, because of the narrowness of the holding, it is unclear whether federal courts may apply state administrative exhaustion requirements to these administrative delay claims in Section 1983 actions.

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