

The Supreme Court Update - February 24, 2026

by Andrew Brantingham, Ian Blodger, Jessica M. Leano, and Brock Huebner

On February 24, 2026, the Supreme Court of the United States issued two decisions:

Hain Celestial Group, Inc. v. Palmquist, No. 24-724: This case considers the scope of federal courts' diversity jurisdiction under 28 U.S.C. § 1332(a), which generally requires that no adverse parties are from the same state and that the amount in controversy exceeds \$75,000. In this case, two Texas citizens filed suit in Texas state court, alleging state law product liability, warranty, and negligence claims against the Hain Celestial Group ("Hain"), a Delaware baby food manufacturer, and Whole Foods, a Texas-headquartered grocery chain. Hain removed the case to federal court, arguing that Whole Foods was improperly joined because the Plaintiffs failed to allege any facially plausible claim against Whole Foods. The federal district court agreed that Whole Foods was improperly joined, dismissed Whole Foods, and eventually entered judgment as a matter of law in favor of Hain on all claims. Plaintiffs appealed and the Fifth Circuit Court of Appeals vacated the judgment after reversing the district court's improper joinder ruling and determining that the case should have been remanded to state court for lack of diversity. In a unanimous decision authored by Justice Sotomayor, the Supreme Court affirmed. Because the parties did not dispute that Whole Foods was improperly dismissed, the federal district court lacked jurisdiction to decide the case and its judgment must be vacated. The Court rejected Hain's argument that the erroneous dismissal of Whole Foods "cured" the jurisdictional defect from the lack of complete diversity. Justice Thomas authored a concurrence questioning the authority of federal courts to make improper joinder rulings in general.

View the Court's [decision](#).

United States Postal Service v. Konan, No. 24-351: This case addresses whether the Federal Tort Claims Act's postal exception applies when postal workers intentionally fail to deliver the mail. Under the postal exception, the United States retains sovereign immunity for all claims "arising out of the loss, miscarriage, or negligent transmission of

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letters or postal matter.” 28 U.S.C. § 2680(b). Lebene Konan sued the United States in federal court, bringing state tort claims alleging that the U.S. Postal Service intentionally and wrongfully withheld her mail. The district court dismissed Konan’s complaint pursuant to the postal exception, holding that the United States enjoys sovereign immunity from claims for personal or financial harms arising from the nondelivery of mail, and the postal exception is not limited to “merely negligent” failure to properly carry mail. The Fifth Circuit reversed, holding that the postal exception does not encompass the intentional act of not delivering mail. In a 5-4 opinion authored by Justice Thomas, the Court vacated and remanded to the Fifth Circuit, holding that the United States retains sovereign immunity for claims arising out of the intentional nondelivery of mail because both “miscarriage” and “loss” of mail can occur as a result of an intentional failure to deliver mail. Justice Sotomayor dissented, joined by Justices Kagan, Gorsuch, and Jackson, finding that a “faithful interpretation” of the postal exception, including Congress’s choice to put “negligent” before “transmission,” and use the words “miscarriage” and “loss” in their common understanding, would lead to the conclusion that intentional misconduct is excluded from the postal exception’s reach.

View the Court's [decision](#).

Yesterday, on February 23, the Supreme Court granted certiorari in one case:

Suncor Energy Inc. v. County Commissioners of Boulder County, No. 25-170: This case involves a lawsuit by Boulder, Colorado against fossil fuel companies, and considers whether Boulder’s climate-related tort claims under Colorado state law are preempted by federal environmental law and the U.S. Constitution. The question presented by the parties is: Whether federal law precludes state-law claims seeking relief for injuries allegedly caused by the effects of interstate and international greenhouse-gas emissions on the global climate. In granting certiorari, the Court also instructed the parties to brief and argue an additional issue: Whether the Supreme Court has statutory and Article III jurisdiction to hear this case.