

The Form Rules Everything: A Seventh Circuit Ruling on ERISA's Substantial Compliance Doctrine

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Partner Joseph Torres and Special Counsel Jennifer Beach authored an article for Employee Relations Law Journal examining the Seventh Circuit's decision in *Packaging Corp. of America Thrift Plan for Hourly Employees v. Langdon*, a ruling that addresses both the standard of review in ERISA interpleader actions and the continued viability of the substantial compliance doctrine for changing plan beneficiaries.

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Joseph and Jennifer walk through how the Seventh Circuit distinguished the case from Eighth Circuit precedent on standard of review, and how the court's treatment of the "positive action" element leaves plan sponsors and administrators with concrete lessons for designing—and enforcing—beneficiary-change procedures.

Joseph chairs Jenner & Block's ERISA Litigation practice and has spent more than 30 years resolving complex employee benefit, employment, and labor disputes at trial and on appeal in federal and state courts nationwide. Jennifer is a special counsel in the firm's Litigation Department and a co-editor of Jenner & Block's ERISA Litigation Handbook, with a practice spanning fiduciary duty claims, benefit denials, and ERISA preemption issues.

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