

# **Bond Case Briefs**

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## **EMPLOYMENT - ILLINOIS**

### **Simpson v. Wayne County, Illinois**

**United States District Court, S.D. Illinois - November 26, 2014 - Not Reported in F.Supp.3d - 2014 WL 6705277**

Office manager for the Wayne County Highway Department was terminated and brought a claim for gender discrimination and retaliation. The County moved for summary judgment.

The District Court held that:

- Employee's actions were not time-barred, citing the Lilly Ledbetter Fair Pay Act which provides that the statute of limitations for filing an EEOC charge alleging pay discrimination resets with each paycheck affected by a discriminatory decision;
- Employee had presented sufficient evidence of gender-based pay discrimination to survive summary judgment;
- Employee had presented enough circumstantial evidence for a jury to infer retaliation and therefore to survive summary judgment on her claim of retaliation.