

Bond Case Briefs

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Lawrence v. School Dist. No. 1

United States Court of Appeals, Tenth Circuit - March 28, 2014 - Fed.Appx. - 2014 WL 1259588

African-American woman who had worked as a social worker in the Denver public school system brought action against school district and board, alleging, inter alia, that she was terminated in retaliation for her decision to file a racial discrimination complaint with the Equal Employment Opportunity Commission (EEOC). The District Court granted defendants' motion for summary judgment, and plaintiff appealed.

The Court of Appeals held that:

- Plaintiff failed to establish that her protected activity was the cause of her former employer's materially adverse action in assigning her to split her time at four different locations;
- Even assuming that plaintiff's suspensions qualified as materially adverse actions, neither the school district nor the school board was liable for plaintiff's supervisor's decision to suspend her; and
- Even assuming that a "cat's paw" claim could be brought here, plaintiff failed to establish that her supervisor's alleged bias proximately caused her termination.