

Summary Judgment Review

Case Name: Davis v. Teachers Retirement System of Georgia

Nature of the Order: Order Adopting Magistrate Judge's Report & Recommendation

Magistrate Judge: Alan J. Baverman

District Judge: Steven D. Grimberg

Claims & Outcomes:

Claim: Title VII, Retaliation

- **Outcome:** Summary Judgment Granted

Long Summary:

The Court adopted the Magistrate's Report & Recommendation.

Defendant Teachers Retirement System of Georgia ("TRS") is an agency of the State of Georgia responsible for administering the pension fund from which teachers in the state's public schools, some employees of the University System of Georgia, and other designated employees in education-related work environments receive retirement benefits. Plaintiff Jamila Davis began working for TRS on March 16, 2016, as a retirement specialist.

On February 7, 2017, Davis filed an EEOC charge against TRS claiming that she was being harassed and retaliated against by her supervisor, Jennifer Alridge. On May 8, 2017, Davis sent an email to TRS Human Resources Generalist Surbrena Johnson stating that Alridge was retaliating against her (Davis) because Davis had filed the EEOC charge. Davis was notified of her termination on May 11, 2017. On May 17, 2017, Davis filed a second charge of discrimination with the EEOC. The EEOC investigated and found that, after Davis's first charge, TRS increased the level of scrutiny of her work product and terminated her employment; TRS's nondiscriminatory reason for termination did not withstand scrutiny; and there was reasonable cause to conclude that TRS had retaliated against Davis for filing her first charge.

Both the Magistrate Judge and district court determined that Plaintiff could not demonstrate that she engaged in statutorily protected conduct because the February charge does not contain complaints about discrimination based on a Title VII protected characteristic. Both the Magistrate Judge and the district court concluded that even if Plaintiff had shown a *prima facie* case, she failed to show pretext. The district court also determined that the Plaintiff failed to present any evidence that the Defendant did not have a good faith honest belief that (1) she acted unprofessionally in a meeting with her supervisor and (2) she altered a document, which she contends is the primary reason for her termination. The district court adopted the Magistrate Judge's Report & Recommendation.