

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

White v. District of Columbia

White v. District of Columbia · No. Civil Action No. 22-03740 (AHA) · Decided January 8, 2026

SUMMARY

The District of Columbia District Court addresses post-trial motions in an age, race, and sex discrimination action brought by Patrice White against the District and an agency director. The court denies judgment as a matter of law and a new trial, finding sufficient evidence supported the jury’s ADEA age-discrimination verdict and that the District was not prejudiced by the trial’s time limits. The court vacates the compensatory damages award because the ADEA does not authorize such damages and declines to award retirement benefits as additional equitable relief.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	Amir H. Ali
JURISDICTION	United States District Court for the District of Columbia
DECIDED	January 8, 2026
DOCKET	Civil Action No. 22-03740 (AHA)
DISPOSITION	other
PROCEDURAL POSTURE	Following a jury verdict finding that the District of Columbia discriminated against White based on age and awarding back pay, front pay, and compensatory damages, the District moved for judgment as a matter of law, alternatively for a new trial, and to vacate the compensatory-damages award. White moved for equitable relief awarding retirement benefits.
STANDARD OF REVIEW	Judgment as a matter of law is appropriate only when the evidence and all reasonable inferences are so one-sided that reasonable jurors could not have reached a verdict for the plaintiff; the court resolves reasonable inferences in the plaintiff's favor and does not assess witness credibility or reweigh the evidence. A new-trial ruling based on trial time limits is reviewed for abuse of discretion, and the moving party must show prejudice.
PRECEDENTIAL VALUE	published

TOPICS

age discrimination damages remedies equitable relief civil procedure

PRACTICE AREAS

employment law federal employment law civil rights remedies civil procedure

QUESTIONS PRESENTED

1. Whether the District was entitled to judgment as a matter of law on the jury's finding that White's termination violated the ADEA.
2. Whether the District was entitled to a new trial because the court imposed allegedly prejudicial trial time limits.
3. Whether the jury's \$75,000 compensatory-damages award had to be vacated because the ADEA does not authorize compensatory damages.
4. Whether White was entitled to retirement benefits as additional equitable relief under the ADEA after presenting those benefits as components of back pay and front pay to the jury.

HOLDINGS

1. The District was not entitled to judgment as a matter of law because the trial evidence provided a legally sufficient basis for a reasonable jury to find that age, rather than the asserted poor-performance reason, was the but-for cause of White's termination.
2. The District was not entitled to a new trial because the court imposed reasonable time limits, repeatedly warned the parties to manage their presentations, and the District failed to show that the limits prejudiced its defense.
3. The \$75,000 compensatory-damages award had to be vacated because the ADEA does not authorize compensatory damages for the age-discrimination claim at issue.
4. White was not entitled to additional retirement-benefit relief because she presented the value of those benefits as part of her back-pay and front-pay claims submitted to the jury, making duplicative equitable relief inappropriate.

KEY QUOTATIONS

“a party has been fully heard on an issue during a jury trial and the court finds that a reasonable jury would not have a legally sufficient evidentiary basis to find for the party on that issue.” (at 4)

“is appropriate only if the evidence and all reasonable inferences that can be drawn therefrom are so one-sided that reasonable men and women could not have reached a verdict in plaintiff’s favor.” (at 4)

“the district court need not—and should not—decide whether the plaintiff actually made out a prima facie case” (at 8)

FACTUAL BACKGROUND

Patrice White, a Black woman, worked for the District of Columbia's Homeland Security and Emergency Management Agency from 1988 until her termination in 2021 at age sixty-one. She presented evidence that senior leadership sought to persuade her to retire, that older employees and older Black women received additional scrutiny, and that her final poor performance evaluation was inconsistent with her prior performance history and was not communicated to her before termination. The District presented evidence that White was terminated for poor performance and that agency leadership had promoted diverse employees.

PROCEDURAL HISTORY

White sued the District and agency director Christopher Rodriguez for age, race, and sex discrimination arising from her termination. The court denied defendants' motion for summary judgment, and the case proceeded to a jury trial. The jury rejected the race and sex claims against the District and the race claim against Rodriguez, but found age discrimination by the District and awarded \$525,000 in back pay, \$0 in front pay, and \$75,000 in compensatory damages. The court denied judgment as a matter of law and a new trial, vacated the compensatory-damages award, and denied White's request for additional retirement benefits as equitable relief.

DISPOSITION

other

REMAND INSTRUCTIONS

No remand. The parties were ordered to meet, confer, and submit a proposed final judgment by January 15, 2026.

CASES CITED

- Radtke v. Lifecare Mgmt. Partners, 795 F.3d 159, 163 (D.C. Cir. 2015)
- Muldrow v. Re-Direct, Inc., 493 F.3d 160, 165 (D.C. Cir. 2007)
- Scott v. District of Columbia, 101 F.3d 748, 753 (D.C. Cir. 1996)
- Baloch v. Kempthorne, 550 F.3d 1191, 1196, 1197 n.2, 1198 (D.C. Cir. 2008)
- Stephenson v. Buttigieg, 712 F. Supp. 3d 33, 41 (D.D.C. 2024)
- Brady v. Office of Sergeant at Arms, 520 F.3d 490, 494 (D.C. Cir. 2008)
- Brown v. Howard University Hospital, 172 F. Supp. 3d 187, 191 (D.D.C. 2016)
- Whelan v. Abell, 48 F.3d 1247, 1251 (D.C. Cir. 1995)
- Beyene v. Hilton Hotels Corp., 958 F. Supp. 2d 247, 249 (D.D.C. 2013)
- Sparshott v. Feld Ent., Inc., 311 F.3d 425, 433-34 (D.C. Cir. 2002)
- Life Plus International v. Brown, 317 F.3d 799, 807 (8th Cir. 2003)
- Ross v. Parrot's Landing, Inc., No. 21-1774, 2022 WL 7367263, at *3 (6th Cir. Oct. 13, 2022)
- U.S. Industries, Inc. v. Blake Construction Co., 671 F.2d 539, 549 (D.C. Cir. 1982)
- Liu v. Georgetown University, No. 22-cv-157, 2024 WL 4362128, at *12 (D.D.C. Sept. 30, 2024)
- Sharkey v. Lasmo (AUL Ltd.), 214 F.3d 371, 375 (2d Cir. 2000)

- Lewis v. District of Columbia, 791 F. Supp. 2d 136, 142-43 (D.D.C. 2011)

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