

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
LOUISIANA

Toshei A. Woods v. Louisiana Special School District

Woods · No. 24-159-BAJ-SDJ · Decided November 26, 2025

SUMMARY

This Magistrate Judge’s Report and Recommendation addresses the Louisiana Special School District’s motion for summary judgment in Toshei A. Woods’s Title VII employment-discrimination and retaliation action. The court recommends granting summary judgment and dismissing the remaining claims, concluding that Woods lacked direct or sufficient circumstantial evidence of race, color, or sex discrimination and failed to establish pretext. The document also includes notice of the 14-day period for filing objections under 28 U.S.C. § 636(b)(1).

CASE DETAILS

COURT	United States District Court for the Middle District of Louisiana
WRITING FOR THE COURT	Scott D. Johnson
JURISDICTION	United States District Court for the Middle District of Louisiana
DECIDED	November 26, 2025
DOCKET	24-159-BAJ-SDJ
DISPOSITION	other
PROCEDURAL POSTURE	Magistrate judge's Report and Recommendation on the defendant's motion for summary judgment in a Title VII employment-discrimination action.
STANDARD OF REVIEW	Summary judgment is appropriate when the movant shows that there is no genuine dispute as to any material fact and that the movant is entitled to judgment as a matter of law. The court must view facts and reasonable inferences in the light most favorable to the nonmovant and may not weigh evidence or assess credibility. Under the McDonnell Douglas framework, the plaintiff bears the ultimate burden of showing intentional discrimination or retaliation, and must produce substantial evidence of pretext after the employer articulates a legitimate, nondiscriminatory reason.
PRECEDENTIAL VALUE	nonprecedential

PARTIES

Toshei A. Woods v. Louisiana Special School District

TOPICS

employment discrimination

title vii

retaliation

hostile work environment

summary judgment

PRACTICE AREAS

employment law

civil rights

civil procedure

QUESTIONS PRESENTED

1. Whether the defendant was entitled to summary judgment on Woods's Title VII claims based on race, color, and sex discrimination.
2. Whether Woods established a prima facie case of disparate pay under Title VII.
3. Whether Woods engaged in protected activity and established a prima facie case of Title VII retaliation.
4. Whether the alleged comments, pay disparity, and workplace treatment were sufficiently severe or pervasive to constitute a hostile work environment under Title VII.

HOLDINGS

1. Woods failed to establish discrimination through direct evidence because the alleged comments were stray remarks that did not prove, without inference or presumption, that race, color, or sex motivated the termination. She also failed to establish a prima facie case under McDonnell Douglas because she identified neither a qualifying replacement nor a similarly situated comparator treated more favorably, and she produced no substantial evidence that the employer's legitimate performance-based reasons were pretextual.
2. Woods failed to establish a prima facie case of disparate pay because she did not identify a nonprotected comparator who was paid more for substantially similar work under nearly identical circumstances.
3. Woods failed to establish a prima facie retaliation claim because her alleged complaints about accountability, funds, allocations, discrepancies, and violations concerning children did not oppose an employment practice she reasonably believed violated Title VII.
4. Woods failed to establish a hostile work environment because the alleged conduct was sporadic, nonthreatening, and at most offensive, rather than sufficiently severe or pervasive to alter the conditions of employment.

KEY QUOTATIONS

“Plaintiff’s own testimony establishes that she did not oppose an employment practice she believed was unlawful under Title VII.” (Discussion § III)

“There is simply no evidence of a hostile work environment, and, accordingly, Plaintiff’s claim fails.” (Discussion § IV)

“IT IS RECOMMENDED that Defendant’s Motion for Summary Judgment (R. Doc. 50) be GRANTED and Plaintiff’s claims against Defendant be DISMISSED.” (Conclusion and Recommendation)

FACTUAL BACKGROUND

Woods worked for the Louisiana Special School District in several positions and became Director of Accountability after a 2021 legislative reorganization. The superintendent, Ernest Garrett, concluded that Woods had substandard performance, lacked necessary leadership and collaborative skills, failed to meet stated objectives, and was not receptive to feedback. Woods's employment was terminated on or about October 29, 2021, and the position was not filled for approximately nine months. Woods relied on alleged comments about race, color, sex, hair, eyelashes, and the stereotype of an angry Black woman, as well as alleged pay disparities and exclusion from emails, to support her Title VII discrimination, retaliation, disparate-pay, and hostile-work-environment claims.

PROCEDURAL HISTORY

Woods filed an employment-discrimination complaint in the Eastern District of Louisiana alleging race, color, sex, and age discrimination and retaliation under Title VII and the ADEA. The Eastern District dismissed the ADEA claims as barred by sovereign immunity but allowed the Title VII claims to proceed, and the case was transferred to the Middle District of Louisiana. After Woods filed her opposition and motion for summary judgment after the applicable deadline, the court considered the filing as an opposition in light of her pro se status. The magistrate judge recommended granting the defendant's motion for summary judgment and dismissing the remaining Title VII claims.

DISPOSITION

other

CASES CITED

- Washburn v. Harvey, 504 F.3d 505, 508 (5th Cir. 2007)
- Celotex Corp. v. Catrett, 477 U.S. 317, 322-25 (1986)
- Delta & Pine Land Co. v. Nationwide Agribusiness Ins. Co., 530 F.3d 395, 398-99 (5th Cir. 2008)
- Portis v. First Nat. Bank of New Albany, Miss., 34 F.3d 325, 328-29 (5th Cir. 1994)
- Cicalese v. Univ. of Texas Med. Branch, 924 F.3d 762, 766 (5th Cir. 2019)
- Etienne v. Spanish Lake Truck & Casino Plaza, LLC, 778 F.3d 473, 475-76 (5th Cir. 2015)
- Herster v. Board of Supervisors of Louisiana State University, 887 F.3d 177, 184-85 (5th Cir. 2018)
- Brown v. E. Miss. Elec. Power Ass’n, 989 F.2d 858, 861 (5th Cir. 1993)
- Wallace v. Methodist Hosp. Sys., 271 F.3d 212, 220, 222 (5th Cir. 2001)
- Jackson v. Cal-W. Packaging Corp., 602 F.3d 374, 380 (5th Cir. 2010)
- McDonnell Douglas Corp. v. Green, 411 U.S. 792, 802 (1973)
- Walker v. Smith, 801 F. App’x 265, 269 (5th Cir. 2020)
- Alkhawaldeh v. Dow Chem. Co., 851 F.3d 422, 426 (5th Cir. 2017)

- *Melvin v. Barr Roofing Co.*, 806 F. App'x 301 (5th Cir. 2020)
- *Dean v. Prop. One Inc.*, 51 F. App'x 929 (5th Cir. 2002)
- *Stallworth v. Singing River Health Sys.*, 469 F. App'x 369, 371 (5th Cir. 2012)
- *McCoy v. City of Shreveport*, 492 F.3d 551, 557 (5th Cir. 2007)
- *Santos v. Baton Rouge Water Works Co.*, 2021 WL 1227875, at *15 (M.D. La. Mar. 31, 2021)
- *Rachid v. Jack In The Box, Inc.*, 376 F.3d 305, 312 (5th Cir. 2004)
- *Jones v. Gulf Coast Rest. Grp., Inc.*, 8 F.4th 363, 369 (5th Cir. 2021)
- *Alvarado v. Tex. Rangers*, 492 F.3d 605, 611 (5th Cir. 2007)
- *Pippins v. Tangipahoa Par. Council*, 2004 WL 1575410, at *7 (E.D. La. July 13, 2004)
- *Riley v. Sch. Bd. Union Par.*, 379 F. App'x 335, 339 (5th Cir. 2010)
- *Cervantez v. KPMG Servs. Co.*, 349 F. App'x 4, 10 (5th Cir. 2009) (per curiam)
- *Mengistu v. Mississippi Valley State University*, 716 F. App'x 331, 333-34 (5th Cir. 2018)
- *Taylor v. United Parcel Serv., Inc.*, 554 F.3d 510, 522-23 (5th Cir. 2008)
- *Squyres v. Heico Cos., LLC*, 782 F.3d 224, 231 (5th Cir. 2015)
- *Badgerow v. REJ Props., Inc.*, 974 F.3d 610, 619 (5th Cir. 2020)
- *EEOC v. Rite Way Serv., Inc.*, 819 F.3d 235, 240 (5th Cir. 2016)
- *Davis v. Dallas Indep. Sch. Dist.*, 448 F. App'x 485, 493 (5th Cir. 2011)
- *Allen v. Envirogreen Landscape Prof., Inc.*, 721 F. App'x 322, 326 (5th Cir. 2017)
- *Tratee v. BP N. Am. Pipelines, Inc.*, 277 F. App'x 390, 395 (5th Cir. 2008)
- *Haley v. Hospital Service District of West Feliciana Parish*, 321 F. Supp. 3d 670, 685-86 (M.D. La. 2018)
- *Brew v. Weyerhaeuser NR Co.*, 537 F. App'x 309, 313 (5th Cir. 2013)
- *Ramsey v. Henderson*, 286 F.3d 264, 268 (5th Cir. 2002)
- *Clark v. City of Alexandria*, 116 F.4th 472, 479 (5th Cir. 2024)
- *Wantou v. Wal-Mart Stores Tex., LLC*, 23 F.4th 422, 433 (5th Cir. 2022)
- *Harris v. Forklift Sys., Inc.*, 510 U.S. 17, 23 (1993)