

SUPREME COURT OF THE UNITED STATES

International Brotherhood of Teamsters v. United States

431 U.S. 324 (1977) · No. Nos. 75-636, 75-672 · Decided May 31, 1977

SUMMARY

The Supreme Court considered whether an employer and union violated Title VII through discriminatory employment practices and a seniority system that perpetuated the effects of prior racial and ethnic discrimination. The Court upheld findings that the employer engaged in a systemwide pattern or practice of discrimination and addressed the application of Title VII's seniority-system provision, including remedies for affected employees.

CASE DETAILS

COURT	Supreme Court of the United States
WRITING FOR THE COURT	Justice Stewart
JURISDICTION	Federal
DECIDED	May 31, 1977
DOCKET	Nos. 75-636, 75-672
DISPOSITION	vacated
PROCEDURAL POSTURE	The United States brought pattern-or-practice Title VII actions against the employer, later joined by the union. After consolidation and trial, the District Court found systemwide racial and ethnic employment discrimination and held that the collective-bargaining seniority system violated Title VII. The Fifth Circuit affirmed the liability findings but modified the remedial decree. The Supreme Court granted certiorari on petitions filed by the employer and union.
STANDARD OF REVIEW	The Court reviewed the lower courts' legal conclusions concerning Title VII, reviewed factual findings for clear error or equivalent deference to findings supported by substantial evidence, and reviewed the equitable remedial framework for legal error and abuse of discretion.
PARTIES	International Brotherhood of Teamsters, T. I. M. E.-D. C., Inc. v. United States

QUESTIONS PRESENTED

1. Whether the employer engaged in a systemwide pattern or practice of intentional employment discrimination in violation of Title VII.
2. Whether statistical and anecdotal evidence was sufficient to establish a prima facie pattern or practice of employment discrimination.
3. Whether an otherwise bona fide, neutral seniority system violates Title VII merely because it perpetuates the effects of pre-Act discrimination.
4. Whether proof of a pattern or practice shifts to the employer the burden of disproving individual entitlement to relief during remedial proceedings.
5. Whether an incumbent employee's failure to make a formal application categorically bars an award of retroactive seniority or other Title VII relief.
6. How the District Court should determine the scope and allocation of equitable relief among actual discriminatees and innocent employees with competing seniority or recall expectations.

HOLDINGS

1. The Government proved that the employer engaged in a systemwide pattern or practice of purposeful racial and ethnic discrimination in hiring, assignment, transfer, and promotion.
2. Statistics are competent and potentially powerful evidence of employment discrimination, although they are not conclusive and must be evaluated in light of all surrounding facts and circumstances.
3. An otherwise neutral and bona fide seniority system does not violate Title VII merely because it perpetuates the effects of pre-Act discrimination.
4. At the liability stage of a pattern-or-practice action, the Government need prove only that unlawful discrimination was the employer's regular procedure or policy; it need not prove that every individual for whom relief may later be sought was a victim.
5. After the Government proves a pattern or practice of discrimination, a post-Act minority applicant who unsuccessfully applied for a line-driver position is presumptively entitled to relief, subject to the employer's showing that the particular refusal was based on a lawful reason.
6. An incumbent employee's failure to formally apply for a job is not an inexorable bar to retroactive seniority or other Title VII relief.
7. A nonapplicant seeking relief must prove that he or she would have applied for the job absent the discriminatory practices and possessed the relevant qualifications; proof of a general discriminatory policy alone does not establish that every nonapplicant was a victim.
8. The District Court must exercise equitable discretion after individualized hearings to determine the scope and allocation of relief, balancing the rights of actual discriminatees against the legitimate expectations of innocent employees.

KEY QUOTATIONS

“It had to establish by a preponderance of the evidence that racial discrimination was the company's standard operating procedure—the regular rather than the unusual practice.” (431 U.S. at 336)

“Statistics are equally competent in proving employment discrimination.” (431 U.S. at 340)

“Accordingly, we hold that an otherwise neutral, legitimate seniority system does not become unlawful under Title VII simply because it may perpetuate pre-Act discrimination.” (431 U.S. at 354)

“We now decide that an incumbent employee's failure to apply for a job is not an inexorable bar to an award of retroactive seniority.” (431 U.S. at 364)

“A nonapplicant must show that he was a potential victim of unlawful discrimination.” (431 U.S. at 368)

FACTUAL BACKGROUND

T. I. M. E.-D. C., a nationwide motor-freight carrier, and the Teamsters represented employees working in separate bargaining units, including line drivers, city drivers, and servicemen. The employer had hired very few Black or Spanish-surnamed employees as line drivers and had assigned many minority employees to lower-paying city-driver and serviceman positions, while discriminatory practices affected hiring, transfers, and promotions. The collective-bargaining seniority system generally gave employees bargaining-unit seniority for bidding, layoff, and recall, causing employees who transferred into line-driving positions to lose seniority accumulated in other units.

PROCEDURAL HISTORY

The District Court found that the employer had engaged in a pattern or practice of discrimination against Black and Spanish-surnamed employees in hiring, assignment, transfers, and promotions, and that the seniority system perpetuated prior discrimination. The Fifth Circuit affirmed the basic liability determinations but expanded the remedial relief and rejected the District Court's subclassification of discriminatees. The Supreme Court vacated the Fifth Circuit's judgment and remanded for further remedial proceedings.

DISPOSITION

vacated

REMAND INSTRUCTIONS

Vacate the Fifth Circuit's judgment and remand to the District Court for individualized evidentiary hearings. The District Court must identify actual victims, determine appropriate relief for post-Act discrimination, deny relief based solely on pre-Act discrimination, refrain from awarding retroactive seniority earlier than the effective date of Title VII, and exercise equitable discretion in balancing discriminatees' rights against innocent employees' seniority and recall expectations. The court must state the reasons for its balancing decision to permit meaningful appellate review.

CASES CITED

- McDonnell Douglas Corp. v. Green, 411 U.S. 792 (1973)
- Albemarle Paper Co. v. Moody, 422 U.S. 405 (1975)
- Franks v. Bowman Transportation Co., 424 U.S. 747 (1976)

- Griggs v. Duke Power Co., 401 U.S. 424 (1971)
- United Air Lines, Inc. v. Evans, 431 U.S. 553 (1977)
- Mayor of Philadelphia v. Educational Equality League, 415 U.S. 605 (1974)
- Washington v. Davis, 426 U.S. 229 (1976)
- Hecht Co. v. Bowles, 321 U.S. 321 (1944)
- Lemon v. Kurtzman, 411 U.S. 192 (1973)
- NLRB v. Nevada Consolidated Copper Corp., 316 U.S. 105 (1942)
- Acha v. Beame, 531 F.2d 648 (2d Cir. 1976)
- Hairston v. McLean Trucking Co., 520 F.2d 226 (4th Cir. 1975)
- Bing v. Roadway Express, Inc., 485 F.2d 441 (5th Cir. 1973)
- United States v. N. L. Industries, Inc., 479 F.2d 354 (8th Cir. 1973)
- Phelps Dodge Corp. v. NLRB, 313 U.S. 177 (1941)
- Alexander v. Louisiana, 405 U.S. 625 (1972)

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