

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
OHIO, WESTERN DIVISION

Taffe v. Givaudan Flavors Corporation

Taffe · No. 1:23-cv-700 · Decided December 10, 2025

SUMMARY

In this Report and Recommendation, the magistrate judge recommends granting Givaudan Flavors Corporation’s motion for summary judgment in Henry George Taffe’s action alleging race discrimination and retaliation under 42 U.S.C. § 1981. The recommendation concludes that Taffe failed to establish a genuine issue of material fact and recommends denying the defendant’s spoliation-sanctions motion as moot.

CASE DETAILS

COURT	United States District Court for the Southern District of Ohio, Western Division
WRITING FOR THE COURT	Stephanie K. Bowman, United States Chief Magistrate Judge
JURISDICTION	United States District Court for the Southern District of Ohio, Western Division
DECIDED	December 10, 2025
DOCKET	1:23-cv-700
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved for summary judgment on Plaintiff's claims for race discrimination and retaliation under 42 U.S.C. § 1981 and separately moved for sanctions for spoliation. The motion for summary judgment was referred to the magistrate judge for a report and recommendation.
STANDARD OF REVIEW	Summary judgment is proper when the record shows no genuine dispute of material fact and the movant is entitled to judgment as a matter of law. The evidence and reasonable inferences are viewed in favor of the nonmovant, but the nonmovant must present significant probative evidence and specific facts showing a genuine issue for trial. Claims under § 1981 were analyzed under the applicable Title VII and McDonnell Douglas frameworks, with but-for causation required.
PRECEDENTIAL VALUE	nonprecedential

PARTIES

Henry George Taffe v. Givaudan Flavors Corporation

TOPICS

racial discrimination

retaliation

summary judgment

civil procedure

employment law

PRACTICE AREAS

employment law

civil rights

civil procedure

QUESTIONS PRESENTED

1. Whether Givaudan was entitled to summary judgment on Taffe's § 1981 race-discrimination claim.
2. Whether Givaudan was entitled to summary judgment on Taffe's § 1981 retaliation claim based on discontinuing estimated overtime payments during continued leave and terminating his employment.
3. Whether Givaudan's motion for spoliation sanctions should be denied as moot after the recommended grant of summary judgment.

HOLDINGS

1. Summary judgment should be granted to Givaudan on Taffe's race-discrimination claim because he abandoned the claim in response to the motion and, independently, failed to present sufficient direct or indirect evidence that race was the but-for cause of any adverse employment action.
2. Summary judgment should be granted to Givaudan on Taffe's retaliation claim because Taffe could not establish that his protected activity was the but-for cause of the discontinuation of estimated overtime payments or his termination, and he could not show that Givaudan's stated reasons were pretextual.
3. The motion for sanctions for alleged spoliation should be denied as moot because summary judgment should be granted to Givaudan.

KEY QUOTATIONS

“Plaintiff must instead prove that the fact that he made informal complaints (as opposed to the manner in which he proceeded) was the “but-for” cause of the reduction in his administrative leave pay and ultimate termination” (Analysis § III.B)

“IT IS RECOMMENDED THAT Defendant’s motion for summary judgment (Doc. 29) be GRANTED, that Defendant’s motion for sanctions (Doc. 30) be DENIED AS MOOT, and that Plaintiff’s claims be dismissed with judgment to be entered in Defendant’s favor.” (Conclusion)

FACTUAL BACKGROUND

Henry George Taffe, a Black maintenance mechanic, worked for Givaudan beginning in August 2021. In March 2022, he complained that a white coworker had used a racial slur and alleged disparate treatment concerning an attendance warning and a potential lead position; he then requested not to return to work while Givaudan investigated, remaining on paid leave. Givaudan conducted multiple investigations and repeatedly sought to return Taffe to work, but Taffe disputed the findings and engaged in contentious, disruptive meetings with

company representatives. Givaudan ultimately terminated him for repeatedly refusing to engage in a respectful two-way discussion about returning to his mechanic position.

PROCEDURAL HISTORY

Taffe sued Givaudan alleging race discrimination and retaliation under 42 U.S.C. § 1981 after Givaudan terminated his employment following an extended period of paid administrative leave and disputes concerning his return to work. The magistrate judge recommended granting summary judgment to Givaudan on both claims and denying the spoliation-sanctions motion as moot, with judgment entered for Defendant, subject to objections under Federal Rule of Civil Procedure 72(b).

DISPOSITION

other

CASES CITED

- Matsushita Electric Industrial Co. v. Zenith Radio Corp., 475 U.S. 574, 586-87 (1986)
- Celotex Corp. v. Catrett, 477 U.S. 317, 325 (1986)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242, 248-52 (1986)
- Mitchell v. Toledo Hospital, 964 F.2d 577, 582, 584-85 (6th Cir. 1992)
- Amini v. Oberlin College, 440 F.3d 350, 358-59 (6th Cir. 2006)
- Comcast Corp. v. National Ass'n of African American-Owned Media, 140 S. Ct. 1009, 1014, 1019 (2020)
- Smith v. City of Toledo, Ohio, 13 F.4th 508, 514 (6th Cir. 2021)
- Brown v. VHS of Michigan, Inc., 545 F. App'x 368, 372 (6th Cir. 2013)
- Gray v. AutoZoners, LLC, No. 22-1069, 2022 WL 16942609, at *3 (6th Cir. Nov. 15, 2022)
- Scheick v. Tecumseh Public Schools, 766 F.3d 523, 530 (6th Cir. 2014)
- Griffin v. Finkbeiner, 689 F.3d 584, 595 (6th Cir. 2012)
- Worthy v. Michigan Bell Telephone Co., 472 F. App'x 342, 347 (6th Cir. 2012)
- Watkins v. Wilkie, No. 1:17-cv-531 (S.D. Ohio Sept. 25, 2019)
- Texas Department of Community Affairs v. Burdine, 450 U.S. 248, 252-55 (1981)
- White v. Baxter Healthcare Corp., 533 F.3d 381, 391 (6th Cir. 2008)
- Arendale v. City of Memphis, 519 F.3d 587, 603 (6th Cir. 2008)
- Clay v. United Parcel Service, Inc., 501 F.3d 695, 703 (6th Cir. 2007)
- McNeal v. City of Blue Ash, Ohio, 117 F.4th 887, 900 (6th Cir. 2024)
- Muldrow v. City of St. Louis, Missouri, 144 S. Ct. 967, 974 (2024)
- Keeton v. Flying J, Inc., 429 F.3d 259, 263 (6th Cir. 2005)
- Birch v. Cuyahoga County Probate Court, 392 F.3d 151 (6th Cir. 2004)
- Bowman v. Shawnee State University, 220 F.3d 456 (6th Cir. 2000)
- Williams v. Hevi-Duty Electric Co., 819 F.2d 620, 629 (6th Cir. 1987)

- Noble v. Brinker International, Inc., 391 F.3d 715, 720 (6th Cir. 2004)
- Boxill v. O'Grady, 935 F.3d 510, 520 (6th Cir. 2019)
- Laster v. City of Kalamazoo, 746 F.3d 714, 730 (6th Cir. 2014)
- Broska v. Henderson, 70 F. App'x 262, 268 (6th Cir. 2003)
- Kellar v. Yunion, Inc., 2025 WL 3039894 (6th Cir. Oct. 31, 2025)
- Kubik v. Central Michigan University Board of Trustees, 717 F. App'x 577, 585 (6th Cir. 2017)
- Rollins v. State of Florida Department of Law Enforcement, 868 F.2d 397, 399-401 (11th Cir. 1989)
- Powell v. Fluor-B&W Portsmouth LLC, No. 2:20-cv-1977-JLG, 2023 WL 6318096, at *8 (S.D. Ohio Sept. 28, 2023)
- Jones v. St. Jude Medical S.C., Inc., 504 F. App'x 473, 480 (6th Cir. 2012)
- Armstrong v. Index Journal Co., 647 F.2d 441, 448 (4th Cir. 1981)
- Manzer v. Diamond Shamrock Chemicals Co., 29 F.3d 1078, 1084 (6th Cir. 1994)
- St. Mary's Honor Center v. Hicks, 509 U.S. 502, 515 (1993)
- Harris v. Metropolitan Government of Nashville and Davidson County, 594 F.3d 476, 486 (6th Cir. 2010)
- Braithwaite v. Timken Co., 258 F.3d 488, 494 (6th Cir. 2001)
- Smith v. Chrysler, 155 F.3d 799, 807 (6th Cir. 1998)
- Thomas v. Arn, 474 U.S. 140 (1985)
- United States v. Walters, 638 F.2d 947 (6th Cir. 1981)