

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Brittany Williams v. Safelite Group, Inc.

Williams v. Safelite · No. 8:24-cv-1978-PX · Decided March 13, 2026

SUMMARY

The United States District Court for the District of Maryland denied Safelite Group, Inc.’s motion for summary judgment on Brittany Williams’ Title VII retaliation claim. The court also denied Safelite’s motion for leave to assert allegedly unrelated misappropriation counterclaims and denied Williams’ motion to sever those counterclaims as moot.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Paula Xinis
JURISDICTION	United States District Court for the District of Maryland
DECIDED	March 13, 2026
DOCKET	8:24-cv-1978-PX
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff brought a Title VII retaliation action. Defendant moved for summary judgment and for leave to assert counterclaims based on alleged misappropriation of confidential corporate information. Plaintiff moved to sever the proposed counterclaims. The court denied summary judgment, denied leave to amend to assert the counterclaims, and denied the motion to sever as moot.
STANDARD OF REVIEW	Summary judgment is appropriate when, viewing the evidence in the light most favorable to the nonmoving party, there is no genuine dispute of material fact and the movant is entitled to judgment as a matter of law. The court applied the McDonnell Douglas burden-shifting framework to the Title VII retaliation claim and evaluated the motion to amend under Federal Rules of Civil Procedure 13(a) and 15(a)(2), including prejudice to the opposing party.
PRECEDENTIAL VALUE	unpublished

TOPICS

- retaliation
- title vii
- employment discrimination
- summary judgment
- civil procedure

PRACTICE AREAS

employment law

civil rights

civil procedure

QUESTIONS PRESENTED

1. Whether the evidence created a genuine dispute of material fact as to Williams's Title VII retaliation claim.
2. Whether Williams's complaint about sexualized comments constituted protected opposition under Title VII.
3. Whether Safelite's investigation, final written warning, and reduced performance evaluation could constitute materially adverse retaliation.
4. Whether the proposed misappropriation counterclaims were compulsory under Federal Rule of Civil Procedure 13(a).
5. Whether Safelite should receive leave under Federal Rule of Civil Procedure 15(a)(2) to assert the proposed counterclaims after discovery had closed.

HOLDINGS

1. A reasonable juror could find that Williams engaged in protected opposition because she reported sexualized comments about her body and clothing that she reasonably believed constituted sexual harassment.
2. An employment action need not affect the terms and conditions of employment to be materially adverse for purposes of Title VII retaliation; it is sufficient if the action might have dissuaded a reasonable worker from engaging in protected activity. The evidence was sufficient for a reasonable juror to find that Safelite's investigation, reduced performance evaluation, and final written warning met that standard.
3. Williams presented sufficient evidence for a reasonable juror to infer that Safelite's decisionmaker knew of her protected activity and that a causal connection existed between her complaint and the adverse actions.
4. Summary judgment was improper because the evidence would permit a factfinder to conclude that Safelite's stated reasons for disciplining Williams were pretextual.
5. Safelite's proposed misappropriation counterclaims were not compulsory under Federal Rule of Civil Procedure 13(a) because Safelite did not have the claims when the pleadings were served and the alleged misappropriation did not arise from the same transaction or occurrence as Williams's retaliation claim.
6. Leave to amend was properly denied because adding the proposed counterclaims after discovery closed would prejudice Williams, create delay and juror confusion, and was unnecessary because Safelite could pursue the alleged misappropriation in a separate action.

KEY QUOTATIONS

“For retaliation, an action is sufficiently adverse even if it does not “affect the terms and conditions of employment,” so long as the action “might have dissuaded a reasonable worker” from engaging in protected

activity.”

“While in the end, a jury may find Safelite’s reason for its formal disciplinary action to be well-warranted and thus non-retaliatory, sufficient evidence compels that this decision be left to the trier of fact.”

FACTUAL BACKGROUND

Brittany Williams worked for Safelite for approximately ten years and ultimately became manager of its Waldorf, Maryland store, where she generally received strong performance reviews. In February 2022, two technicians made sexualized comments about Williams's body and clothing; she provided them Safelite's sexual-harassment policy and reported the incident to management. Safelite investigated Williams's complaint but also investigated her management style, then issued her a final written warning and reduced her performance evaluation. Williams alleged that these actions retaliated against her for opposing sexual harassment.

PROCEDURAL HISTORY

Williams filed a Title VII retaliation complaint after Safelite issued her a final written warning and reduced her performance evaluation following her complaint about sexualized workplace comments. Safelite answered and the parties engaged in discovery. After discovery closed, Safelite moved for summary judgment and sought leave to add counterclaims concerning alleged 2025 misappropriation of trade secrets; Williams opposed and moved to sever. The court denied all substantive motions.

DISPOSITION

other

CASES CITED

- Celotex Corp. v. Catrett, 477 U.S. 317, 322 (1986)
- Emmett v. Johnson, 532 F.3d 291, 297 (4th Cir. 2008)
- Bouchat v. Baltimore Ravens Football Club, Inc., 346 F.3d 514, 522 (4th Cir. 2003)
- Peters v. Jenney, 327 F.3d 307, 314 (4th Cir. 2003)
- Campbell v. Hewitt, Coleman & Associates, Inc., 21 F.3d 52, 55 (4th Cir. 1994)
- Phoenix Savings & Loan, Inc. v. Aetna Casualty & Surety Co., 381 F.2d 245, 249 (4th Cir. 1967)
- Burlington Northern & Santa Fe Railway Co. v. White, 548 U.S. 53, 59-60, 64, 68 (2006)
- Laughlin v. Metropolitan Washington Airports Authority, 149 F.3d 253, 259-60 (4th Cir. 1998)
- Boyer-Liberto v. Fontainebleau Corp., 786 F.3d 264, 282 (4th Cir. 2015)
- McDonnell Douglas Corp. v. Green, 411 U.S. 792 (1973)
- Strothers v. City of Laurel, 895 F.3d 317, 327-28 (4th Cir. 2018)
- Foster v. University of Maryland-Eastern Shore, 787 F.3d 243, 250 (4th Cir. 2015)
- Roberts v. Glenn Industrial Group, Inc., 998 F.3d 111, 124 (4th Cir. 2021)
- Wannamaker-Amos v. Purem Novi, Inc., 126 F.4th 244, 257 (4th Cir. 2025)
- Painter v. Harvey, 863 F.2d 329, 332 (4th Cir. 1988)

- Arora v. James, 689 F. App'x 190, 190 (4th Cir. 2017)
- Medline Industries, Inc. v. York Building Products Co., 702 F. Supp. 3d 403, 408-09 (D. Md. 2023)
- Class Produce Group, LLC v. Harleysville Worcester Insurance Co., No. 16-CV-3431, 2018 WL 5785664, at *3 (D. Md. Nov. 5, 2018)
- Laber v. Harvey, 438 F.3d 404, 427 (4th Cir. 2006)
- Davis v. Piper Aircraft Corp., 615 F.2d 606, 613 (4th Cir. 1980)

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