

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

Aguayo v. R.J. Reynolds Tobacco Co.

670 F. Supp. 1094 (D.P.R. 1987) · No. Civ. No. 86-1236 (JP) · Decided August 17, 1987

SUMMARY

The United States District Court for the District of Puerto Rico granted R.J. Reynolds Tobacco Company's motion for summary judgment in an age-discrimination action brought under the ADEA and Puerto Rico Law 100. The court held that although the plaintiff established a prima facie case, he failed to show that the employer's stated nondiscriminatory reason for his discharge was pretextual. The court dismissed both the federal and pendent territorial claims.

CASE DETAILS

COURT	United States District Court for the District of Puerto Rico
WRITING FOR THE COURT	Pieras, District Judge
JURISDICTION	Puerto Rico
DECIDED	August 17, 1987
DOCKET	Civ. No. 86-1236 (JP)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Defendant moved for summary judgment on plaintiff's federal ADEA claim and pendent Puerto Rico Law 100 age-discrimination claim.
STANDARD OF REVIEW	Summary judgment is proper when the pleadings, depositions, answers to interrogatories, admissions, and affidavits show no genuine issue of material fact and the moving party is entitled to judgment as a matter of law. The record and reasonable inferences must be viewed in the light most favorable to the nonmoving party.
PRECEDENTIAL VALUE	Published federal district court opinion
PARTIES	Felix Aguayo, The conjugal partnership composed of Felix Aguayo's marriage with Aida Esther Diaz v. R.J. Reynolds Tobacco Company (Puerto Rico)

TOPICS

- age discrimination
- summary judgment
- employment law
- civil rights
- civil procedure

PRACTICE AREAS

Employment law

Civil rights

Civil procedure

QUESTIONS PRESENTED

1. Whether the employer was entitled to summary judgment on Aguayo's ADEA age-discrimination claim after articulating a legitimate, nondiscriminatory reason for the discharge.
2. Whether Aguayo's evidence was sufficient to establish that the employer's stated reason for discharge was a pretext for age discrimination.
3. Whether the employer was entitled to summary judgment on the Puerto Rico Law 100 age-discrimination claim after rebutting the statutory presumption of discharge without just cause.

HOLDINGS

1. Aguayo established a prima facie case because he was within the protected age group, had satisfactory performance evaluations, was discharged, and was replaced by a younger employee.
2. Aguayo failed to show that R.J. Reynolds's legitimate, nondiscriminatory explanation for his discharge was pretextual; challenging the quality of the employer's business decision and merely casting doubt on the explanation were insufficient.
3. The Law 100 claim failed because the employer's evidence rebutted the statutory presumption that Aguayo was discharged without just cause and satisfied its burden of production and persuasion.

KEY QUOTATIONS

"Summary judgment is only proper 'if the pleadings, depositions, answers to interrogatories, and admissions on file, together with the affidavits, if any, show that there is no genuine issue as to any material fact and that the moving party is entitled to a judgment as a matter of law.'" (670 F. Supp. at 1095)

"Attacking the quality of the defendant's business decision is insufficient to prove pretext." (670 F. Supp. at 1097)

"The Court determines that the defendant has satisfied its burden under both the ADEA and Law 100, and that the plaintiff was unable to sustain his burden under both statutes." (670 F. Supp. at 1098)

FACTUAL BACKGROUND

Felix Aguayo was hired by R.J. Reynolds as Director of Sales at age 42, worked in that position for approximately five years, and was discharged at age 47. His performance evaluations were satisfactory, and he was replaced by a 34-year-old internal candidate. The employer asserted that Aguayo was discharged because he failed to follow a sales-quota decision made at a management meeting; Aguayo's deposition repeatedly identified that managerial disagreement as the reason for his dismissal and did not provide evidence that the explanation was pretextual.

PROCEDURAL HISTORY

Aguayo sued R.J. Reynolds Tobacco Company, alleging that he was discharged because of his age. The case came before the United States District Court for the District of Puerto Rico on the defendant's motion for summary judgment and plaintiff's opposition. The court granted summary judgment for the defendant and dismissed the action.

DISPOSITION

dismissed

CASES CITED

- Hahn v. Sargent, 523 F.2d 461, 464 (1st Cir. 1975), cert. denied, 425 U.S. 904 (1976)
- Poller v. Columbia Broadcasting System, 368 U.S. 464, 473 (1962)
- Celotex Corp. v. Catrett, 477 U.S. 317, 325 (1986)
- Loeb v. Textron, 600 F.2d 1003, 1014, 1018 n.20 (1st Cir. 1979)
- Dea v. Look, 810 F.2d 12, 15 (1st Cir. 1987)
- McDonnell Douglas Corp. v. Green, 411 U.S. 792, 805 (1973)
- White v. Vathally, 732 F.2d 1037, 1043 (1st Cir. 1984)
- Wildman v. Lerner Stores Corp., 771 F.2d 605 (1st Cir. 1985)
- Wildman v. Lerner Stores Corp., 582 F. Supp. 80, 86 (D.P.R. 1984)
- Ibañez v. Molinos de P.R., Inc., 83 JTS 30 (1983)