

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
LOUISIANA

Vanessa Taylor v. St. Landry Parish School Board

No. 6:24-cv-01125 (W.D. La. Dec. 22, 2025) · No. 6:24-cv-01125 · Decided December 22, 2025

SUMMARY

The United States District Court for the Western District of Louisiana grants the St. Landry Parish School Board’s motion for summary judgment in Vanessa Taylor’s employment discrimination lawsuit. The court dismisses claims alleging age and gender discrimination, retaliation, and hostile work environment under the ADEA, Title VII, 42 U.S.C. § 1981, the Louisiana Employment Discrimination Law, and the Louisiana Whistleblower Statute. The ruling concludes that Taylor failed to establish the required elements or provide sufficient evidence to create a genuine dispute of material fact.

CASE DETAILS

COURT	United States District Court for the Western District of Louisiana
WRITING FOR THE COURT	David C. Joseph
JURISDICTION	United States District Court for the Western District of Louisiana, Lafayette Division
DECIDED	December 22, 2025
DOCKET	6:24-cv-01125
DISPOSITION	affirmed
PROCEDURAL POSTURE	Motion for summary judgment by defendant
STANDARD OF REVIEW	Summary judgment standard under Fed. R. Civ. P. 56
PRECEDENTIAL VALUE	unpublished

TOPICS

- employment discrimination
- age discrimination
- title vii
- retaliation
- hostile work environment
- summary judgment
- civil procedure

PRACTICE AREAS

- employment law
- civil rights
- civil procedure

QUESTIONS PRESENTED

1. Whether Plaintiff established a prima facie case of age discrimination under the ADEA
2. Whether Plaintiff established a prima facie case of gender discrimination under Title VII and the LEDL
3. Whether Plaintiff established a prima facie case of retaliation under Title VII, the ADEA, and the Louisiana Whistleblower Statute
4. Whether Plaintiff established a hostile work environment under Title VII and the LEDL
5. Whether Plaintiff has a private cause of action for employment discrimination or retaliation under Title IX

HOLDINGS

1. Section 1981 protects only against race-based discrimination and retaliation; age and gender discrimination claims cannot be brought under § 1981.
2. Plaintiff failed to establish a prima facie case because she did not demonstrate she was qualified for the AD position under the restructured requirements or that she suffered an adverse employment action.
3. Plaintiff's retaliation claims fail because the non-reappointment occurred before any protected activity, and Plaintiff's inquiry about the reasons for non-reappointment was not protected activity under Title VII.
4. Plaintiff's allegations of being publicly demoted, subject to belittling comments, and ostracism did not constitute conduct sufficiently severe or pervasive to create an abusive working environment.
5. Title VII provides the exclusive remedy for employment discrimination based on sex in federally funded educational institutions; Title IX does not afford a private cause of action for such claims.
6. Title IX retaliation claims are preempted by Title VII when not based exclusively on allegations of noncompliance with Title IX's substantive provisions.

FACTUAL BACKGROUND

Plaintiff was appointed Athletic Director at North Central High School. A new principal restructured the position to be full-time and incompatible with head coaching duties. Plaintiff refused to resign as girls' basketball coach, and the principal declined to reappoint her as AD for the next school year, appointing another person who agreed to the non-coaching requirement.

PROCEDURAL HISTORY

Plaintiff filed employment discrimination claims in state court, which were removed to federal court based on federal question jurisdiction. Defendant moved for summary judgment.

DISPOSITION

affirmed

CASES CITED

- Celotex Corp. v. Catrett, 477 U.S. 317 (1986)
- Deshotel v. Wal-Mart Louisiana, L.L.C., 850 F.3d 742 (5th Cir. 2017)
- Anderson v. Liberty Lobby, Inc., 477 U.S. 242 (1986)
- Tubacex, Inc. v. M/V Risan, 45 F.3d 951 (5th Cir. 1995)
- Turner v. Baylor Richardson Med. Ctr., 476 F.3d 337 (5th Cir. 2007)
- Matsushita Elec. Indus. Co. v. Zenith Radio Corp., 475 U.S. 574 (1986)
- Yarbrough v. SlashSupport, Inc., 152 F.4th 658 (5th Cir. 2025)
- Bobo v. ITT, Cont'l Baking Co., 662 F.2d 340 (5th Cir. 1981)
- Alleman v. Louisiana Dep't of Econ. Dev., 698 F. Supp. 2d 644 (M.D. La. 2010)
- Runyon v. McCrary, 427 U.S. 160 (1976)
- Spann v. FedEx Freight, Inc., 2024 WL 3155888 (S.D. Miss. June 17, 2024)
- CBOCS West, Inc. v. Humphries, 553 U.S. 442 (2008)
- McDonnell Douglas Corp. v. Green, 411 U.S. 792 (1973)
- Dabbasi v. Motiva Enterprises, L.L.C., 107 F.4th 500 (5th Cir. 2024)
- Reeves v. Sanderson Plumbing Prod., Inc., 530 U.S. 133 (2000)
- Hardison v. Skinner, 2022 WL 2668514 (5th Cir. July 11, 2022)
- Jackson v. Cal-Western Packaging Corp., 602 F.3d 374 (5th Cir. 2010)
- Saketkoo v. Adm'rs of Tulane Educ. Fund, 31 F.4th 990 (5th Cir. 2022)
- Ragas v. Tennessee Gas Pipeline Co., 136 F.3d 455 (5th Cir. 1998)
- Ray v. Tandem Computs., Inc., 63 F.3d 429 (5th Cir. 1995)
- McCoy v. City of Shreveport, 492 F.3d 551 (5th Cir. 2007)
- Hamilton v. Dallas Cnty., 79 F.4th 494 (5th Cir. 2023)
- Trahan v. Rally's Hamburgers, Inc., 696 So.2d 637 (La. App. 1st Cir. 1997)
- Brown v. E. Miss. Elec. Power Ass'n, 989 F.2d 858 (5th Cir. 1993)
- Ames v. Ohio Dept. of Youth Servs., 605 U.S. 303 (2025)
- Lewis v. Bd. of Supervisors of Louisiana State Univ. & Agric. & Mech. Coll., 134 F.4th 286 (5th Cir. 2025)
- Sherrod v. Am. Airlines, Inc., 132 F.3d 1112 (5th Cir. 1998)
- Grizzle v. Travelers Health Network, Inc., 14 F.3d 261 (5th Cir. 1994)
- Long v. Eastfield College, 88 F.3d 300 (5th Cir. 1996)
- Rayborn v. Bossier Par. Sch. Bd., 881 F.3d 409 (5th Cir. 2018)
- Strong v. Univ. Healthcare Sys., L.L.C., 482 F.3d 802 (5th Cir. 2007)
- Smith v. AT&T Sols., 90 F. App'x 718 (5th Cir. 2004)
- Imbornone v. Treasure Chest Casino, 2006 WL 1235979 (E.D. La. May 3, 2006)
- Tatum v. United Parcel Serv., Inc., 79 So.3d 1094 (La. Ct. App. 2011)
- Baker v. Am. Airlines, Inc., 430 F.3d 750 (5th Cir. 2005)
- Southard v. Tex. Bd. Of Criminal Justice, 114 F.3d 539 (5th Cir. 1997)
- Patrick v. Walmart, Inc., 2020 WL 908443 (W.D. La. Feb. 24, 2020)

- Ackel v. Nat'l Commc'ns., 339 F.3d 376 (5th Cir. 2003)
- Hernandez v. Yellow Transp., Inc., 670 F.3d 644 (5th Cir. 2012)
- Aryain v. Wal-Mart Stores Tex. LP, 534 F.3d 473 (5th Cir. 2008)
- Univ. of Tex. Sw. Med. Ctr. v. Nassar, 570 U.S. 338 (2013)
- Harvill v. Westward Commc'ns, L.L.C., 433 F.3d 428 (5th Cir. 2005)
- Burlington Northern & Santa Fe Ry. Co. v. White, 548 U.S. 53 (2006)
- Oncale v. Sundowner Offshore Services, Inc., 523 U.S. 75 (1998)
- Lauderdale v. Texas Dep't of Criminal Justice, Institutional Div., 512 F.3d 157 (5th Cir. 2007)
- Robinson v. Healthworks Int'l, L.L.C., 837 So.2d 714 (La. App. 2d Cir. 2003)
- Nat'l R.R. Passenger Corp. v. Morgan, 536 U.S. 101 (2002)
- Wantou v. Wal-Mart Stores Tex., L.L.C., 23 F.4th 422 (5th Cir. 2022)
- Faragher v. City of Boca Raton, 524 U.S. 775 (1998)
- Herster v. Bd. of Supervisors of La. State Univ., 72 F. Supp. 3d 627 (M.D. La. 2014)
- Jackson v. Birmingham Bd. of Educ., 544 U.S. 167 (2005)
- Willis v. Cleco Corp., 749 F.3d 314 (5th Cir. 2014)
- Davis v. Dall. Area Rapid Transit, 383 F.3d 309 (5th Cir. 2004)
- Collins v. Jackson Pub. Sch. Dist., 609 F. App'x 792 (5th Cir. 2015)
- Taylor-Travis v. Jackson State Univ., 984 F.3d 1107 (5th Cir. 2021)
- Lakoski v. James, 66 F.3d 751 (5th Cir. 1995)
- Lowrey v. Texas A&M Univ. Sys., 117 F.3d 242 (5th Cir. 1997)
- Normore v. Dallas Indep. Sch. Dist., 677 F. Supp. 3d 494 (N.D. Tex. 2023)
- Johnson v. Hospital Corp. of America, 767 F. Supp. 2d 678 (W.D. La. 2011)
- Fort Bend Cnty., Texas v. Davis, 587 U.S. 541 (2019)