

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
ALABAMA, SOUTHERN DIVISION

Miranda Pilato v. John Samaniego, et al.

Pilato · No. 2:23-cv-866-ACA · Decided February 26, 2026

SUMMARY

The United States District Court for the Northern District of Alabama granted summary judgment to Sheriff John Samaniego on Miranda Pilato’s claims for sex-based termination and pay discrimination under Title VII and pay discrimination under the Equal Pay Act. The court held that the termination and Title VII pay claims were barred by the applicable 180-day EEOC filing deadline and that Pilato failed to establish the substantially similar work required for an Equal Pay Act claim.

CASE DETAILS

COURT	United States District Court for the Northern District of Alabama, Southern Division
JURISDICTION	United States District Court for the Northern District of Alabama, Southern Division
DECIDED	February 26, 2026
DOCKET	2:23-cv-866-ACA
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved for summary judgment on the plaintiff’s remaining Title VII sex-termination, Title VII pay-discrimination, and Equal Pay Act pay-discrimination claims.
STANDARD OF REVIEW	Summary judgment is appropriate when the evidence, viewed in the light most favorable to the nonmoving party, shows no genuine dispute of material fact and the movant is entitled to judgment as a matter of law.
PRECEDENTIAL VALUE	unknown
PARTIES	Miranda Pilato v. John Samaniego, Shelby County Sheriff John Samaniego, et al.

TOPICS

- title vii
- employment discrimination
- summary judgment
- statute of limitations
- civil procedure

PRACTICE AREAS

employment law

civil rights

civil procedure

QUESTIONS PRESENTED

1. Whether Pilato's Title VII sex-based termination claim was barred because she did not file an EEOC charge within 180 days of her termination.
2. Whether Pilato's Title VII pay-discrimination claim was barred because she did not file an EEOC charge within 180 days of her final paycheck and failed to establish equitable tolling.
3. Whether Pilato presented sufficient evidence to establish a prima facie Equal Pay Act claim by showing that she performed substantially equal work for less pay than male employees.

HOLDINGS

1. The Title VII termination claim was barred because Pilato filed her EEOC charge nearly 300 days after her June 8, 2022 termination, exceeding Alabama's 180-day filing period.
2. The Title VII pay-discrimination claim was untimely, and Pilato failed to establish equitable tolling.
3. Pilato failed to establish a prima facie Equal Pay Act claim because she offered no evidence that she performed substantially equal work requiring equal skill, effort, and responsibility under similar working conditions.

KEY QUOTATIONS

“To satisfy the burden, “a plaintiff must show that an employer pays different wages to employees of opposite sexes for equal work on jobs the performance of which requires equal skill, effort, and responsibility, and which are performed under similar working conditions.””

“The standard to prove that the plaintiff “performed substantially similar work for less pay” is “fairly strict.””

“Instead, “the controlling factor” to determine “whether two jobs are substantially equal must be actual job content.””

FACTUAL BACKGROUND

Miranda Pilato joined the Shelby County Sheriff's Office as a deputy sheriff in April 2018 and was placed at step two of the office's pay scale. Male and female deputies hired around the same period were placed at different steps, including male deputy Colin Johnson at step four. Sheriff John Samaniego terminated Pilato's employment on June 8, 2022. Pilato filed an EEOC charge on March 27, 2023, alleging that her termination and lower pay were based on sex.

PROCEDURAL HISTORY

Miranda Pilato filed suit after her employment with the Shelby County Sheriff's Office was terminated and after alleging that she had been paid less than male deputies. She filed an EEOC charge on March 27, 2023, alleging

sex-based termination and pay discrimination. The court granted Sheriff Samaniego's motion for summary judgment on all three remaining claims.

DISPOSITION

other

CASES CITED

- Ramji v. Hospital Housekeeping Systems, LLC, 992 F.3d 1233, 1237 (11th Cir. 2021)
- Wilkerson v. Grinnell Corp., 270 F.3d 1314, 1317 (11th Cir. 2001)
- Ledbetter v. Goodyear Tire & Rubber Co., Inc., 421 F.3d 1169, 1178 & n.13 (11th Cir. 2005)
- City of Hialeah v. Rojas, 311 F.3d 1096, 1101–02 (11th Cir. 2002)
- Hogan v. Secretary, U.S. Department of Veterans Affairs, 121 F.4th 172, 178–79 (11th Cir. 2024)
- Villarreal v. R.J. Reynolds Tobacco Co., 839 F.3d 958, 971–72 (11th Cir. 2016) (en banc)
- Baker v. Upson Regional Medical Center, 94 F.4th 1312, 1317, 1319 (11th Cir. 2024)
- Arrington v. Cobb County, 139 F.3d 865, 876 (11th Cir. 1998)
- Mulhall v. Advance Security, Inc., 19 F.3d 586, 592 (11th Cir. 1994)