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IN THE COURT OF APPEALS
OF THE STATE OF WASHINGTON
DIVISION ONE

CHRISTINE E. GALBRAITH, Appellant

vs.

MICROSOFT CORPORATION, a Washington
Corporation, Respondent

Case No. 70932-1-I

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APPEAL FROM THE SUPERIOR COURT
FOR KING COUNTY
HONORABLE KENNETH SCHUBERT

APPELLANT'S REPLY BRIEF

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I. INTRODUCTION

In its brief, Microsoft presents a number of straw man arguments which are without merit. Microsoft also ignores or mischaracterizes the evidence which overwhelmingly supports Galbraith's claims. At minimum, this evidence raises genuine issues of material fact which preclude summary dismissal of her claims.

II. ARGUMENT

A. **Galbraith has identified similarly situated coworkers who were treated more favorably.**

Microsoft asserts Galbraith's disparate treatment discrimination claims were properly dismissed because Galbraith failed to identify any similarly situated employees who were treated more favorably than Galbraith. This assertion is based solely on portions of Galbraith's deposition testimony in which Microsoft counsel asked Galbraith speculative and ambiguous questions about other employees in the Solution Delivery Group who were not on Galbraith's team. Contrary to Microsoft's assertion, Galbraith identified the similarly situated employees as

the Solution Managers on her team who reported to Salvador Segura, all of whom are male or younger than Galbraith. CP 394; 48; 161-162.

More importantly, Microsoft's contention ignores its own employee information submitted by Galbraith in opposition to the summary judgment motion. CP Sub 147 B- Exhibit G. The spreadsheets contained on this disk identify the employees in the Solution Delivery Group who reported to Salvador Segura and provide information for each employee including their salary, their job title, their supervisor, their age, and their promotion history. CP Sub 147B-Exhibit G; 453-454.¹

All of the employees on Galbraith's team are male and/or younger than Galbraith. CP Sub 147B-Exhibit G. They all are Solution Managers performing (by Microsoft's own description of the position of Solution Manager) similar jobs. CP 30; Respondent's Brief, Page 6-7. Microsoft does not dispute they all report to the same managers and are ranked against each other for purposes of job performance and promotion.

¹ The employees who reported to Segura include: Jeff Carl, Eric Carnite, Chris Galbraith, Pooja Ghera, Phoenix Rudner, David Schuba, Tambe Summers, Marielga Tome, Jeff Ward and Ramana Kotapati.

Microsoft does not dispute its own employee data considered by the trial court show Galbraith was at the lowest pay level, and promoted less often, than the other Solution Managers on her team who were male or younger. CP Sub 147B- Exhibit G. Microsoft does not deny these employees were all evaluated by the same managers for purposes of job performance and promotion. Microsoft cannot reasonably assert these employees were not similarly situated.

The most obvious similarly situated employee is Ramana Kotapati, Galbraith's replacement. He was hired for the position which Microsoft posted to replace Galbraith. CP 248-249; 632-635. He had responsibility for managing the exact same payroll applications (Tools) as Galbraith. CP 632-635; 390. Kotapati did not have any prior experience with SAP software programs which were an important part of the job. CP 590-592; 621:4-622:20; 641:17-22. He testified his job responsibilities did not change until five months after he was hired. CP 636:5-637:19. He also testified he was moved to a new position, and another younger male employee assumed responsibility for the same payroll applications as Galbraith. CP 637:25-639:10. Galbraith presented evidence that

this employee, who is substantially younger than Galbraith, was also paid substantially more than Galbraith. CP 597-601.

Microsoft makes additional misleading assertions concerning Galbraith's testimony about other similarly situated employees. Microsoft claims Galbraith did not know what Kotapati, did exactly or what he was paid. Microsoft does not acknowledge it designated most of the employee information it submitted as highly confidential and did not allow this information to be disclosed to Galbraith personally. Microsoft also fails to point out the deposition of Kotapati occurred *after* Galbraith's deposition. CP 276, 628. Kotapati was hired after Galbraith left Microsoft and she had no personal knowledge about Kotapati when she was deposed.

B. Galbraith has presented evidence raising genuine issues of material fact which preclude summary judgment as to her disparate treatment age and sex discrimination claims.

As mentioned above, Microsoft relies mostly on speculative and ambiguous testimony from Galbraith's deposition for its assertion there is insufficient evidence to support a prima facie case for disparate treatment age and sex discrimination. However, Galbraith's age and sex discrimination claims are

supported by abundant evidence which raise genuine issues of material fact and preclude summary judgment.

Galbraith has presented evidence supporting a prima facie case of disparate treatment age and sex discrimination. As explained above, she has presented evidence that similarly situated employees who are male, or younger than her, were treated more favorably in terms of compensation, promotion, and work conditions. Galbraith has also presented direct evidence of age and sex discrimination. Her former manager, Angela Graves, testified that Galbraith should have been at a higher pay level even after Galbraith's last promotion. CP 328:8-329:11; 51. Graves testified Galbraith was discriminated against as a female and that only males were promoted to the higher level positions. CP 332:9-12; 339:4-7; 343:7-10; 345:7-12. Graves further testified she was told by Salvador Segura Galbraith would not receive further promotions because she was close to retirement. CP 329-330. Galbraith contends the term "close to retirement" was code for age discrimination. She was the only employee on her team close to normal retirement age and she had not notified Microsoft of any

plans to retire. CP 330. She was being treated less favorably due to her age.

Galbraith has also presented evidence Microsoft *itself* determined the appropriate pay level for her in 2006 was Level 62, when Galbraith was only at Level 59. CP 33; 51; 391; 307:21-308:12; 309:9-12. Galbraith testified Jeff Ward requested Microsoft's Human Resources Department to determine the appropriate pay level for her position based on her job responsibilities. CP 33; 391; 608:14-609:17. Mr. Ward told Galbraith that HR determined the appropriate pay level was 62. CP 33; 307:21-308:12. At his deposition, Mr. Ward did not dispute HR determined the appropriate pay level for Galbraith's position should be 62.² CP 608:14-609:17.

It is undisputed that a much younger male employee, Mr. Kotapati, was hired for the position held by Galbraith at a salary more than \$40,000 more than Galbraith's salary. CP 593-596; 651:22-656:17; 640:12-18. It is undisputed he had responsibility for exactly the same payroll applications as Galbraith when he was

² Mr. Ward testified that he asked his manager, Salvador Segura, to go to HR and obtain the appropriate pay level for Galbraith's position, and he could not recall what HR told Mr. Segura. CP 608:14- 609:17.

hired and lacked the experience Galbraith had with these payroll tools. CP 593-596; 651:22-656:17; 640:12-18.

Angela Graves also testified about her own discrimination as a female while working at Microsoft and stated only males were promoted to the higher positions. CP 331:1-332:12; 339:4-7; 337:14-338:6; 343:7-10; 345:7-12. This is evidence of discriminatory animus in the Solution Delivery Group. Viewed in the light most favorable to Galbraith, this evidence is more than sufficient for a jury to infer that Galbraith's age or sex were substantial factors in Microsoft's failure to promote her as often, and treat her less favorably with respect to compensation and job conditions.

C. Microsoft has not presented sufficient evidence of a legitimate, non-discriminatory reason for treating Galbraith less favorably.

Under the burden shifting rules utilized by the courts in Washington, once the employee presents evidence sufficient to establish a prima facie case of discrimination, the employer must present evidence of a legitimate, non-discriminatory reason for treating the employee less favorably than others outside the protected class. *Fulton v. Dept. of Social & Health Servs.*, 169

Wn.App.137, 149; 279 P.3d 500 (2012). Microsoft asserts a number of baseless reasons why it did not promote Galbraith and pay her comparable to other Solution Managers. Microsoft asserts Galbraith worked fewer hours than other employees and was not “available” on weekends. Microsoft also asserts Galbraith refused to use a laptop computer and attend training seminars. None of these purported reasons are in fact true. Galbraith came in to work much earlier than the other employees on her team and did not normally take lunch breaks. CP 26, 42, 66, 395. The other employees typically took 1-2 hour lunch breaks and went to the gym during normal work hours. CP 26, 42, 395. Galbraith also worked evenings and weekends when necessary to complete her job responsibilities, and preferred to work from home using her home computer rather than hauling a laptop to and from work. CP 26, 42, 395. Galbraith had been working the same hours for many years and it had never been an issue with her managers. Her former manager, Angela Graves, testified Galbraith’s work schedule “did not make it difficult in any way for her to perform her job.” CP 356. Graves also testified none of these purported reasons were mentioned by Segura when he told her why Galbraith would not receive further promotions, including the assertion that Galbraith

refused to apply for new positions or take on new responsibilities.
CP 356- 357.

Microsoft claims Galbraith refused to travel, but Galbraith testified her position did not require travel and she had a fear of flying. CP 16. Microsoft asserts Galbraith “did not apply for and refused to consider or accept transfers or promotions to different positions.” (Respondent’s Brief, Pg. 7) This is both misleading and inaccurate. Employees at Microsoft do not “apply” for promotions. Promotions are granted by managers based on employee performance. CP 325. Galbraith testified she would not have qualified for other desirable positions because her pay level was too low. CP 15, 254-256.

Microsoft does not dispute other employees on Galbraith’s team, and in the Solution Delivery Group, received promotions to higher pay levels *without taking new positions* or additional responsibilities. CP 395. Galbraith was recognized throughout the company as an expert on the payroll applications she managed. CP 216, 218, 214-222, 256-267. She won several awards for her outstanding contributions to the company. CP 73, 265-267, 396-397. Galbraith received glowing performance reviews from her

prior managers in the Solution Delivery Group, and there was no mention of any of these purported issues for not promoting her to a higher pay level. CP 325:24-326:18; 18, 189, 194, 202, 211, 222. It is also undisputed Galbraith did take on additional job assignments. CP 390-391, 323:5-324:2; 350-351, 286:22-288:18; 289:8-292:1; 615. The addition of retail employees was a substantial undertaking involving a completely different payroll process and different rules. CP 39, 42, 94-97.

D. Galbraith Has Presented Sufficient Evidence of Pretext.

Even assuming Microsoft presented evidence of legitimate, non-discriminatory reasons for treating Galbraith less favorably; Galbraith has presented overwhelming evidence establishing these reasons are pretext. Angela Graves' testimony that Galbraith would not receive further promotions solely because she was older and closer to retirement, demonstrates that none of the reasons asserted by Microsoft are the true reason Galbraith did not receive further promotions. CP 355-357; 321:20-322:4; 328:8-21; 329:19-330:4; CP 346:7-16. This is consistent with the evidence that after Angela Graves was told this by Salvador Segura, Galbraith did not receive any further promotions. Since Segura could not

recommend any further promotions for Galbraith, he was compelled to come up with excuses for not granting further promotions. CP 391-392. Segura does not dispute Galbraith's testimony that he took no interest in what she was doing, and told her he did not know what to tell his superiors about her work when he met with them to decide on promotions. CP 391-395.

Microsoft determined in 2006 that the appropriate pay level for Galbraith's position and responsibilities was 62, two pay levels higher than Galbraith was at when she left Microsoft. CP 33. Microsoft does not dispute Galbraith deserved a promotion in 2008 based on her excellent job performance. This evidence demonstrates Microsoft's purported reasons for not promoting Galbraith to at least pay level 62 are pretext. There is no evidence Microsoft ever indicated to Galbraith that her work hours, lack of a laptop computer, not attending training seminars or other reasons they cite, were obstacles to her promotion except for the performance review Segura gave Galbraith *after* he told Graves she would not receive further promotions.

Microsoft also asserts Galbraith's unwillingness to take on additional responsibilities outside of her already excessive duties

was a reason for her not receiving further promotions. However, Microsoft does not dispute Galbraith's testimony that she performed numerous special projects for HR which were not part of her job responsibilities, and took a leadership role in Microsoft's Disaster Recovery Plan. CP 390-391; 323:5-324:2; 218; 327:5-25; 348:14-23; 351-352. The particular incident when Galbraith told an employee in another department "it's not my job" was explained by Galbraith at her deposition. CP 50. Microsoft has offered no evidence indicating Galbraith's reasons for saying this were not well-founded. Galbraith's deteriorating health and frustration in the final years of her employment were the direct result of Microsoft's discriminatory actions in refusing to reduce her excessive workload. CP 393; 365:4-11; 399-400. As Galbraith testified, she believed she might die if she continued to work under these conditions. CP 394.

Microsoft also asserts the statement by Segura that Galbraith would not receive further promotions because she was close to retirement was only a "stray remark" and not sufficient to be considered evidence of discrimination. This argument is unpersuasive. It is highly unusual for an employer to explicitly

state the true reason for a discriminatory action. This is not a stray remark but rather *direct evidence* of Microsoft's discrimination against Galbraith regarding pay and promotions. The cases cited by Microsoft are easily distinguishable from this case. In *Scrivener v. Clark College*, 176 Wash.App. 405, 309 P. 3d 613 (2013), *review granted*, 179 Wn.2d 1009 (2014), the remark made by the college president that the college needed "younger talent" was made in a speech and was not connected directly to the plaintiff teacher or the decision not to hire her for a permanent teaching position. *Id.* at 415. In this case, the statement by Segura was *specifically about* Galbraith and whether she would receive further promotions. CP 329:24-330:25; 346:7-16.

Microsoft also argues the statement by Segura is not evidence of age discrimination. The only authority Microsoft cites for this assertion are federal cases based on the federal Age Discrimination in Employment Act (ADEA). These cases are not persuasive for several reasons. The ADEA is a completely different statute from the WLAD and Title VII discrimination statutes, and is more restrictive than both of these statutes. The Washington Supreme Court recently reaffirmed it is not bound by

federal case law and is “free to adopt those theories and rationale which best further the purposes and mandates of our state statute.” *Kumar v. Gate Gourmet, Inc.*, No. 88062-0, Pg. 7-8 (May 22, 2014). In addition, the court in the *Hazen Paper* case cited by Microsoft held the employer *could* be liable “where the employer uses pension-status is a proxy for age” *Hazen Paper Co. v. Biggins*, 507 U.S. 604, 604, 113 S. Ct. 1701, 123 L. Ed. 2d 338 (1993). Galbraith contends Microsoft’s use of the term “close to retirement” is proxy for age. Galbraith had not notified Microsoft of any plans to retire. CP 330:10-12. Employees who are close to retirement are usually older employees.

Viewing all of the evidence in the light most favorable to Galbraith, a jury could reasonably conclude Segura’s statement was evidence that Galbraith’s age was a substantial factor in the decision to not grant Galbraith further promotions.

E. The Trial Court Erred in Dismissing Galbraith’s Disparate Impact Age Discrimination Claim.

Microsoft’s contention that Galbraith has waived her disparate impact claim is incorrect. Assignment of Error No. 3 specifically addresses the trial court’s ruling concerning the

statement made by Segura regarding promotions for Galbraith which is the basis for Galbraith's disparate impact claim. Galbraith addressed the disparate impact age claim in her opposition to the summary judgment and at the summary judgment hearing. She discussed the policy statement which is the basis for this claim in her Opening Brief at pages 23, 29 and 43.

Microsoft contends Galbraith has not identified any policy which has a disparate impact on older employees. As Galbraith previously asserted, the policy was contained in the statement by Segura that Microsoft does not grant promotions to employees who are close to retirement. Galbraith has presented testimony of her manager at the time this statement was made, Angela Graves, that Segura met with his superiors, including Wasif Rasheed, the manager of the Solution Delivery Group, to decide which employees would receive promotions. CP 648:18-650:16; 329-330. The policy expressed by Segura was decided by his superiors. CP 648:18-650:16. Segura testified that decisions regarding promotions had to be approved by Wasif Rasheed. CP 649:1-25.

The disparate impact of this policy on older workers is obvious. The policy specifically prohibits further promotions for

older workers who by definition are closer to retirement.

Microsoft cannot plausibly argue this policy does not disproportionately impact older workers, and it has not presented any evidence to support such a position.

To establish a prima facie case of disparate impact under the WLAD, the plaintiff must show that (1) a facially neutral employment practice (2) falls more harshly on a protected class. *Kumar v. Gate Gourmet, Inc., supra* at Page 24. Galbraith has presented evidence of a policy of Microsoft to not promote employees who are close to retirement, which falls more harshly on older employees.

The *Hudon* case and other decisions cited by Microsoft regarding disparate impact claims are not on point. These cases involved subjective compensation and employment decisions *specific to the employee*. In this case, the policy or practice being challenged is the objective, non-specific practice of not promoting any employees who are close to retirement.

F. Galbraith Has Presented Evidence Raising Material Issues of Fact Regarding Her Disability Discrimination Claim.

Microsoft mischaracterizes Galbraith's disability discrimination claim, asserting it is based on Galbraith's disabilities preventing her from performing her job. Galbraith's claim is based on the undisputed facts that Galbraith's "crippling workload" was negatively impacting her disabilities and Microsoft refused to accommodate her disabilities by reducing her excessive workload. CP 176-178; 391-392; 317:11-318:1; 286:22-288:18; 289:8-292:1; 303:20-304:1; 657:8-21.

Galbraith first alerted Microsoft of this in 2007 and Microsoft HR was notified by her managers. CP 391, 176-178, 608:14-609:17. Temporary assistance was provided to Galbraith by outside vendors. CP 286:22-288:18; 289:8-292:1; 303:20-304:1; 392. Microsoft does not dispute that Galbraith's workload later increased further when Microsoft began employing retail employees. CP 286:22-288:18; 289:8-292:1. Microsoft does not dispute that after 2008, it provided *no further accommodation* to Galbraith. CP 286:22-288:18; 289:8-292:1; 303:20-304:1; 392.

Microsoft asserts "Galbraith admits she did not need an accommodation because she was able to satisfactorily complete

her work without need for accommodation, and Galbraith admits she never told her supervisor she needed accommodation because of any medical condition.” (Respondent’s Brief, Pg. 29) This is refuted by the very same testimony of Galbraith cited by Microsoft to support this misleading and false claim. Galbraith testified specifically that after the temporary help was provided in 2007, her workload increased substantially with the addition of retail employees and she was taking extra medication to try to slow her heart down enough to sleep. CP 31. She was asked: “Did you tell Salvador you had an irregular heartbeat? Her answer: “Yes.” She was then asked if she told Salvador she needed an accommodation for the irregular heartbeat and she answered “I said I needed help, yes.” CP 31; 392; 303:20-304:1

Microsoft argues it would have been illegal for Mr. Segura to question Galbraith about her health. This is another specious argument which ignores the fact Galbraith had disclosed her heart condition in 2007 to her manager, who notified Segura, and Microsoft HR was brought in to engage her regarding accommodating her disability. CP 391-392;

657:8-658:20. Microsoft already had knowledge that Galbraith's heart condition was being negatively impacted by her excessive workload and had an affirmative duty to continue to reasonably accommodate her disability when she requested it after 2007. Segura did not engage her in a dialogue concerning accommodation, even though he personally knew of her heart condition.

Microsoft asserts even if Galbraith was disabled and requested accommodation, Washington law does not require it to reduce Galbraith's workload. It asserts the court in the *Pulcino v. Federal Express Corp.*, 141 Wn.2d 629, 9 P.3d 787 (2000) held that an employer as a matter of law was not required to accommodate a disabled employee by reducing the employee's workload. (Respondent's Brief at 31). However, the court did *not* so hold or even mention this in the sentence referred to by Microsoft in its brief. The court referred to another case where the Court of Appeals held the employer had no duty to assign the employee a *new supervisor* or assign the employee a new position *with a different supervisor* to

accommodate her “emotional condition.” *Pulcino*, 141 Wn.2d at 644 (Emphasis added).

The evidence also supports a disability discrimination claim based on the excessive workload she was expected to manage compared with similarly situated non-disabled employees. CP 176-178; 391-394; 365:4-11; 373:9-11. Microsoft treated her less favorably than other employees on her team who were not disabled by requiring her to do much more. It is undisputed Galbraith had responsibility for more Tools than any other Solution Manager. CP 390; 322:17-24. Both of her former managers, Jeff Ward and Angela Graves, have acknowledged her workload was “crippling” and more than the other Solution Managers. CP 177-179, 610:13-611:1. Jeff Ward stated in his 2007 email to Segura regarding Galbraith's workload and health issues that “the only thing I can fault her for is not quitting a long time ago.” CP 177-179.

G. Microsoft Has Not Presented Evidence Sufficient To Raise A Genuine Issue of Material Fact Regarding Galbraith’s Equal Pay Act Claim.

In discussing Galbraith’s Equal Pay Act claim, Microsoft again ignores the undisputed evidence that Galbraith

was paid less than male employees performing the same or similar work. It is undisputed that all of the male Solution Managers on Galbraith's team earned more than Galbraith. CP Sub 147B-Exhibit G; 492-500. It is undisputed Microsoft hired a male employee, Ramana Kotapati, for the position Galbraith vacated and paid Kotapati over \$40,000 more than Galbraith in base salary. CP 593-596; 651:22-656:17; 640:12-18. He managed the same payroll Tools as Galbraith when he started the job and reported to the same managers. CP 621:4-622:20; 655:24-656:17; 641:17-22; 632:2-636:7. It is also undisputed the male employee who assumed Galbraith's position after Kotapati moved to another position was also paid significantly more than Galbraith.

Microsoft's attempts to justify this wage disparity are without merit. The contention that Kotapati's bachelor's degree would justify such a wage disparity is refuted by the evidence that Microsoft did not require a college degree for this position if the applicant had related experience such as Galbraith. CP 247-249. Jeff Ward, who held the position before Galbraith and was at three pay levels higher than

Galbraith, did not have a college degree. CP 604:14-17; Sub 147B-Exhibit G.

Microsoft's claim that Mr. Kotapati was hired for a different position is unsupported by the evidence. Kotapati testified that his job duties, which were similar to Galbraith's if not identical, did not change until five months after he was hired. CP 247-249; 652:5-17; 633:20-638:9. In any event, it is undisputed that the male who took over Galbraith's former position after Kotapati was also paid substantially more than her.

H. Galbraith's Discrimination Claims Are Not Time-Barred.

The trial court ruled only the disability discrimination claim was time-barred based on the incorrect finding that Galbraith's claim was based on a discrete act which occurred in 2007.

Microsoft's assertion that Galbraith's discrimination claims are discrete acts, and therefore time-barred, is factually and legally incorrect. Factually, the evidence is undisputed that the discriminatory practices of Microsoft, including failure

to promote and less favorable work conditions, and failure to accommodate her disability, continued from 2007 up to her resignation in 2011. Even if it is assumed these were discrete acts as opposed to continuing violations, they continued *each year* and therefore any acts which occurred within three years of the filing of this lawsuit are not time-barred.

As discussed in Galbraith's Opening Brief, the cases relied upon by Microsoft for the assertion that these claims are not subject to the equitable tolling doctrine are unpersuasive. The *Crownover* and *Antonius* cases were hostile work environment cases which are unique. The courts decided to not apply the continuing violation doctrine because doing so would further the mandate of the WLAD. Contrary to Microsoft's assertion, the court in *Antonius* did not reject the continuing violation doctrine for *all* types of discrimination claims under the WLAD. The court did not overrule the cases cited by Galbraith.

With respect to the disability discrimination claim, the trial court improperly found it was based on a discrete act occurring in 2007. Galbraith's claim is based on the

continuing failure of Microsoft to accommodate her disability up to the time she resigned. CP 177-178; 391-392. As the evidence demonstrates, it was Microsoft's continued failure to reduce her excessive workload which forced her to retire earlier than she planned. CP 393-394; 365:4-11; 373:9-11; 398-400.

Microsoft contends all of Galbraith's discrimination claims are time-barred because Galbraith knew of the discrimination as early as 2006. This assertion is based on Galbraith's deposition testimony regarding Jeff Ward telling her she did not get promoted due to her age. Galbraith incorrectly answered that Mr. Ward told her this in 2006. CP 35. She subsequently testified this conversation occurred "toward the end of the process, end of the process of trying and trying, after the last refusal from Lou Gracie," but she did not correct her previous statement and confirm this occurred shortly before she left Microsoft in 2011, not in 2006. CP 35. In her Declaration in opposition to the summary judgment motion, Galbraith clarified this conversation with Ward occurred in 2011. CP 391. This is confirmed by the email

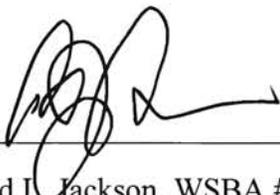
exchange between Galbraith and Ward in 2010 after Angela Graves confided to Galbraith what Segura said about no further promotions for Galbraith. CP 254-256. Neither Ward nor Galbraith indicated any prior discussion regarding possible age discrimination, and Ward actually expressed shock at the suggestion she was not being promoted due to her age. CP 254-256.

III. CONCLUSION

Galbraith respectfully requests that the court reverse the trial court's order granting summary judgment as to all of Galbraith's claims; and issue instructions to the trial court to enter summary judgment in favor of Galbraith on her claim for violation of the Equal Pay Act.

Respectfully submitted this day of 4th June, 2014.

JACKSON LAW FIRM

By: 

Ronald L. Jackson, WSBA #14903
Attorney for Appellant

CERTIFICATE OF SERVICE

I, Katie Sherwood, certify that:

1. I am an employee of Jackson Law Firm for Appellant Christine Galbraith in this matter. I am over 18 years of age, not a party hereto, and competent to testify if called upon.
2. On June 4, 2014, I served a true and correct copy of the foregoing document on the following party, attorney for Respondent, via email (with permission) as follows:

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I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

SIGNED at Bellevue, Washington, this 4th day of June, 2014


Katie Sherwood

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