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Division II
State of Washington
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No. 52293-4-II

COURT OF APPEALS, DIVISION II
OF THE STATE OF WASHINGTON

LORI MACKEY,
Appellant

v.

HOME DEPOT USA, INC. dba THE HOME DEPOT STORE #4718,
JAMIE KRALL, and JENNIFER ILES,
Respondents.

BRIEF OF APPELLANT

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TABLE OF CONTENTS

TABLE OF AUTHORITIES 5
INTRODUCTION 7
ASSIGNMENTS OF ERROR..... 8

1) The trial court erred when it granted summary judgment in favor of defendants Home Depot USA, Inc., Jamie Krall, and Jennifer Isles, and dismissed Mackey’s claim for discriminatory discharge based on Mackey’s disability after the trial court incorrectly decided that there was not sufficient evidence of discriminatory intent. The trial court further erred when it decided that defendant Home Depot was justified in terminating Mackey because it had performed an investigation into Mackey’s performance..... 8

2) The trial court erred when it granted summary judgment in favor of defendants Home Depot USA, Inc., Jamie Krall, and Jennifer Isles and dismissed Mackey’s claim of denial of reasonable accommodation, because the trial court determined the defendants had sufficiently accommodated Mackey..... 9

3) The trial court erred when it granted summary judgment in favor of defendants Home Depot USA, Inc., Jamie Krall, and Jennifer Isles and dismissed Mackey’s claim for retaliatory discharge based on Mackey’s claim that Krall had mistreated her, after the trial court incorrectly decided that there was not sufficient evidence of retaliatory intent, and defendant Home Depot was justified in terminating Mackey because of the investigation it performed. 9

4) The trial court erred when it granted summary judgment in favor of defendants Home Depot USA, Inc., Jamie Krall, and Jennifer Isles and dismissed Mackey’s claims after deciding that the termination of Mackey did not violate public policy..... 9

| | |
|--|----|
| STATEMENT OF THE CASE | 10 |
| A. Mackey’s Disabilities | 11 |
| B. Accommodations provided to Mackey | 11 |
| C. Disparate Treatment given to Mackey | 12 |
| D. Defendants’ Policies | 12 |
| E. Mackey’s Evaluations | 15 |
| F. The Incident | 15 |
| G. Defendants’ Motions for Summary Judgment | 16 |
| H. Mackey’s Opposition to Defendants’ Motions | 16 |
| ARGUMENT..... | 18 |
| A. The Trial Court’s Decision is Not Entitled to Deference, But Should Be Reviewed De Novo | 18 |
| B. The Court’s Decision Incorrectly Applies the Case Law Regarding Discriminatory Discharge | 19 |
| C. The Trial Court Failed to Properly Apply Washington Law to Mackey’s Retaliation Claim | 23 |
| D. Mackey’s Discharge Was in Violation of Public Policy..... | 28 |

E. The Trial Court Failed to Properly Analyze Whether Defendants’ Justification for Terminating Mackey was Made in Good Faith 29

F. The Trial Court Failed to Apply Washington Case Law Regarding Reasonable Accommodation 32

CONCLUSION 35

TABLE OF AUTHORITIES

Cases

Barnes v. Wash. Natural Gas Co., 22 Wn. App. 576, 583, 591 P.2d 461 (1979) 20

Cornwell v. Microsoft Corp., 192 Wn.2d 403, 430 P.3d 229 (2018) 24 – 28

Criswell v. W. Airlines, Inc., 709 F.2d 544, 552 (9th Cir. 1983) 31

Delahunty v. Cahoon, 66 Wn. App. 829, 839 (1992) 28

Dicomes v. State, 113 Wn.2d 612, 618, 782 P.2d 1002 (1989) 28

Fancom v. Costco Wholesale Corp., 98 Wn.App. 845, 861-62, 991 P.2d 1182, 1191 (2000). 24

Hartley v. State, 103 Wn.2d 768, 774, 698 P.2d 77 (1985)..... 19

Hisle v. Todd Pac. Shipyards Corp., 151 Wn.2d 853, 6860, 93 P.3d 108 (2004)..... 18

Kermini v. International Health Care Props. XXIII Ltd. Pshp., 1999 Wash. App. LEXI 581 (Wash. App. 1999) 33, 34

Owen v. Burlington N & Santa Fe R.R., 153 Wn.2d 780, 787, 108 P.3d 1220, 1223 (2005)..... 19

Parris v. Wyndham Vacations Resorts Inc. 979 F.Supp.2d 1069, 1081 (D. Hawaii 2013) 31

Riehl v. Foodmaker, Inc., 152 Wn.2d 138, 150, 94 P.3d 930 (2004) 20, 32

Ruff v. King County, 125 Wn.2d 697, 703, 887 P.2d 886 (1995).. 19

Scrivener v. Clark Coll., 181 Wn.2d 439, 445, 334 P.3d 541 (2014)
 20

Statutes

RCW 49.60.180 19

RCW 49.60.210(1) 23

I.
INTRODUCTION

Lori Mackey has been denied the right to pursue her claims against the defendants in this matter because of a misinterpretation of fact and law. The trial court paid lip service to the holdings of the Washington appellate courts concerning what are deemed to be a reasonable accommodation and whether an inference of discrimination is sufficient to create an issue of fact, but then ignored those holdings in granting summary judgment to the defendants, and dismissing Mackey's claims.

Mackey worked at Defendant Home Depot's Vancouver, Washington location for eight years. During her employment she was granted some accommodations for her disabilities. Shortly before her termination, Mackey suffered what she deemed to be a hostile verbal attack which affected her disabilities, and she attempted to address the attack with a supervisor. After informing the supervisor of the verbal attack, defendant Home Depot began an investigation into Mackey's

employment and ultimately terminated her for what it deemed to be violation of company policies. Mackey filed a lawsuit against defendants alleging wrongful termination, failure to provide reasonable accommodations and discrimination. Defendants filed for summary judgment alleging that it consistently provided reasonable accommodations to Mackey and that Mackey's termination was justified based upon its investigation into her work practices. Mackey, accordingly, asks this court to reverse the ruling and reinstate her right to pursue relief for her injuries.

II.

ASSIGNMENTS OF ERROR

1. The trial court erred when it granted summary judgment in favor of defendants Home Depot USA, Inc., Jamie Krall, and Jennifer Isles, and dismissed Mackey's claim for discriminatory discharge based on Mackey's disability after the trial court incorrectly decided that there was not sufficient evidence of discriminatory intent. The trial court further erred when it decided that defendant Home Depot

was justified in terminating Mackey because it had performed an investigation into Mackey's performance.

2. The trial court erred when it granted summary judgment in favor of defendants Home Depot USA, Inc., Jamie Krall, and Jennifer Isles, and dismissed Mackey's claim denial of reasonable accommodation, because the trial court determined the defendants had sufficiently accommodated Mackey.

3. The trial court erred when it granted summary judgment in favor of defendants Home Depot USA, Inc., Jamie Krall, and Jennifer Isles, and dismissed Mackey's claim for retaliatory discharge based on Mackey's complaint that defendant Krall had mistreated her, after the trial court incorrectly decided that there was not sufficient evidence of retaliatory intent, and defendant Home Depot were justified in terminating Mackey because of the investigation it performed.

4. The trial court erred when it granted summary judgment in favor of defendants Home Depot USA, Inc., Jamie Krall, and Jennifer Isles and dismissing Mackey's claims after deciding that the termination of Mackey did not violate public policy.

III.

STATEMENT OF THE CASE

Lori Mackey worked for Home Depot for approximately eight years, starting in 2006 until her termination in October 2014. CP 127. During her employment she received positive annual reviews and did not have any disciplinary action taken against her. CP 132. Mackey suffered from various disabilities which required reasonable accommodations to be given by Defendants. Defendants failed to provide Mackey with a reasonable accommodation for her physical disability despite requests by Mackey. Additionally, prior to her termination, Mackey was verbally attacked by another employee of Defendants which triggered her disability. Mackey went to a supervisor to report the incident. Soon after Mackey reported the verbal attack, Defendants opened an investigation into Mackey's employment and ultimately terminated her determining that she violated company policies.

A. Mackey's Disabilities

During the time that she worked for Defendants, Mackey had the following disabilities: depression; post-traumatic stress disorder; and degenerative disc disease. CP 128. Mackey provided Defendants with the requisite medical documentation to show evidence of her disabilities and Defendants did not dispute that Mackey had disabilities which required reasonable accommodations. CP 128.

B. Accommodations provided to Mackey

Mackey was provided accommodations related to her depression and post-traumatic stress disorder including a scheduling accommodation, a five-days-in-a-row accommodation, and part-time work. RP 4-5. Mackey requested an accommodation due to her physical disability which provided that she could not lift anything over fifteen pounds, and could not lift items over her head. CP 128. Rather than giving her an accommodation where she would not be required to lift anything over fifteen pounds, Mackey was repeatedly given jobs where she was supposed to perform heavy lifting and/or lift items above her head. CP 128. In order to perform the tasks required for her job,

Mackey needed to ask other employees to help her because she was unable to perform the tasks. CP 128.

C. Disparate Treatment given to Mackey

Mackey was consistently treated differently than other employees of Defendants who did not have disabilities. Mackey was frequently berated in meetings with defendant Isles because her sales were not higher, but other employees who had worked there as long as Mackey, did not have any disabilities, and had sales lower than Mackey's were encouraged to try harder. CP 129.

D. Defendants' Policies

When Mackey started working for Home Depot, she was informed that she was authorized to give discounts up to \$50.00 to any customer. CP 129. Mackey was also informed that volume discounts or volume bid discounts existed where a customer could obtain a volume discount if the customer wanted to purchase a package of products above a certain dollar amount. *Id.* Defendants' policy was that if a customer wanted to obtain a volume discount or volume bid discount, the customer would select and identify the products he or she wanted,

Mackey (or another sales representative) would submit the request to the bid desk to get a price for the package of products being purchased, and the price from the bid desk would be lower than the marked price on the sales floor. *Id.* A customer was allowed to inquire about multiple product packages and could receive multiple bids from the bid desk. CP 130-131. During her employment, Mackey assisted multiple customers with receiving discounted bids from the bid desk. CP 131. At no time during her employment did Mackey ever unilaterally provide a customer with a volume bid discount. *Id.*

After a bid discount was provided to a customer, Mackey would separate the items which were awarded a discount from those that were not. This allowed products that were immediately available to be delivered, and the products that were not immediately available to be ordered. *Id.* Despite Mackey's best attempts to ensure that no double dipping occurred, there were times that customers would receive an additional discount at the cash register if the cashier scanned a discount code that was not on the order. *Id.* Mackey alerted defendant Home Depot's operation manager about "double dipping" that occurred on

some of her sales due to the cashier scanning a coupon that was not on the order, and Mackey was told that the operations manager would look into it. *Id.*

There was one occasion when Mackey provided an additional discount to a customer who had previously purchased a refrigerator and the replacement refrigerator was more expensive than the original refrigerator. However, in that instance Mackey spoke with a supervisor who told her to apply the discount. *Id.* On the occasion where Mackey provided a customer with a volume discount, even after the customer failed to purchase enough items from the order to justify the discount, Mackey immediately alerted a supervisor who told her not to worry about it and to not do it in the future. CP 131-132.

E. Mackey's Evaluations

Mackey was given semi-annual reviews from Defendants. In her March 2014 review, Mackey was originally given an "O" rating which stood for Top Performer and was the highest level an employee could be given. CP 133. This review was subsequently downgraded to a "V" which stood for Valued Employee when a supervisor was replaced.

However, in her September 2014 review, Mackey was also given an “O” rating. *Id.* Mackey did not ever receive a review which had any discussion of any unjustified discounts being given to customers nor was Mackey ever reprimanded for giving customers improper discounts. *Id.*

F. The Incident

On September 26, 2014, defendant Krall verbally berated and attacked Mackey. CP 132. Mackey told defendant Krall that she could not think clearly when being attacked due to her disabilities. *Id.* Instead of changing her behavior or tactics, defendant Krall told Mackey “We all have problems.” *Id.* Even though Mackey started to cry, defendant Krall did not stop berating and yelling at Mackey until another manager came into the room and told defendant Krall that she was being inappropriate. *Id.* The next day Mackey told the store manager about the incident with defendant Krall and he told Mackey that he would take care of it. *Id.*

The store manager's way of "taking care of it" was to start an investigation into Mackey and her employment. This investigation was then used to terminate Mackey.

G. Defendants' Motions for Summary Judgment

All defendants filed motions for summary judgment. Defendants sought to have Mackey's claims dismissed because they provided Mackey with reasonable accommodations and her termination was justified based on the results of their investigation.

H. Mackey's Opposition to the Defendants' Motions

Mackey has always acknowledged that she was given **some** accommodations for her mental disabilities. However, Mackey was not given reasonable accommodations for her physical disabilities. Defendants continued to assign Mackey more tasks that she was unable to perform because of her disabilities. In opposition to the claim that its termination of Mackey was justified because of the investigation, Mackey provided the timeline of incidents which preceded the investigation which included her alerting the store manager of Defendants' employee berating her and the effect that it

had on Mackey as a result of her disabilities. Mackey worked for defendants for several years without any problems or discussions of her application of the defendants' discount system. It was not until after Mackey alerted management of the verbal attack she suffered by defendant Krall that defendant Home Depot determined that it needed to investigate Mackey. This sequence of events raised, at a minimum, an inference of discrimination which created an issue of fact requiring the denial of defendants' motion for summary judgment.

The motion was heard on July 9, 2018. The court granted defendants' motions and dismissed Mackey's claims. The court found that while it was required to take all inferences in the light most favorable to the non-moving party (Mackey), it did not believe a jury could find an inference of discrimination despite Mackey telling Defendants' store manager of the incident where she was berated only a few days before Defendant began its investigation into her employment. RP 50. The court further found that Defendants provided Mackey with reasonable accommodations for her physical disabilities even though the accommodations required Mackey to seek

out other employees, on her own, for assistance in order for Mackey to perform the tasks of her employment. RP 51-52.

The court entered its final order dismissing all Defendants on July 9, 2018. This appeal followed.

III

ARGUMENT

A. The Trial Court’s Decision is Not Entitled to Deference, But Should be Reviewed De Novo

An appellate court reviews summary judgment orders *de novo* and performs the same inquiry as the trial court. *Hisle v. Todd Pac. Shipyards Corp.*, 151 Wn.2d 853, 860, 93 P.3d 108 (2004). The court examines the pleadings, affidavits, and depositions before the trial court and “take[s] the position of the trial court and assume[s] facts [and reasonable inferences] most favorable to the nonmoving party.” *Ruff v. King County*, 125 Wn.2d 697, 703, 887 P.2d 886 (1995) (citing *Hartley v. State*, 103 Wn.2d 768, 774, 698 P.2d 77 (1985)); *Owen v. Burlington N. & Santa Fe R.R.*, 153 Wn.2d 780, 787, 108 P.3d 1220, 1223 (2005). In this case Mackey is the

nonmoving party. Thus, all facts and reasonable inferences must be viewed in the light most favorable to her.

B. The Trial Court's Decision Incorrectly Applies the Case Law Regarding Discriminatory Discharge.

While Washington is an at-will employment state, an employer is not allowed to terminate an employee based on his or her disabilities and requests for accommodation. RCW 49.60.180. To show that Mackey was terminated because of her disability she must first show that (1) she had, or was perceived as having, a disability; (2) she was able to perform the essential functions of her job, with reasonable accommodation; and (3) the circumstances give rise to a reasonable inference that her disability or requests for accommodation were a substantial factor for her termination. *Barnes v. Wash. Natural Gas Co.*, 22 Wn. App. 576, 583, 591 P.2d 461 (1979). In the absence of direct evidence of discriminatory intent, courts use a burden-shifting framework to analyze discrimination claims at the summary judgment stage. *Riehl v. Foodmaker, Inc.*, 152 Wn.2d 138, 150, 94 P.3d 930 (2004). Under the burden-shifting framework, Plaintiff must

make out the *prima facie* elements described above and then the burden shifts to the Defendant to show a legitimate non-discriminatory reason for the discharge. *Id.* If the Defendant shows such a reason, the burden shifts back to the Plaintiff to offer evidence that the proffered reason is a pretext for discrimination. *Id.* The burdens on each party are burdens of production, not persuasion, and the burden may be met with direct or circumstantial evidence. *Scrivener v. Clark Coll.*, 181 Wn.2d 439, 445, 334 P.3d 541 (2014).

In the current case, there is no dispute that Mackey had disabilities and that Defendants were aware of the disabilities. CP 136. Regarding element two, Mackey brought forth evidence that not only was she able to perform the tasks of her jobs with reasonable accommodations made for the mental disabilities but that she performed it well through the performance reviews she received and the fact that she was never reprimanded or punished by defendant Home Depot for her work practices. CP 103, 132, 136, RP 22. Lastly, regarding element three, Mackey brought forth evidence that there is at least a reasonable inference of discriminatory intent as to

her termination because she made a complaint to the store manager and, days later, Home Depot instituted an investigation into her employment practices and terminated her. CP 136.

As clearly discussed at the hearing, while there was no direct evidence of discriminatory intent, there was an inference of discriminatory intent because Mackey complained to her store manager about being berated by her supervisor regarding her disabilities, then defendant Home Depot began an investigation into Mackey's discounting practices almost immediately, and Mackey was ultimately terminated shortly after the investigation began. RP 26.

The trial court, in giving its ruling, acknowledged:

I'm required to take inferences in the light most favorable to the non-moving party. That inference would be that because September 27th predates October 8th, that any reasonable jury could find that there was therefore a discriminatory intent. Here's the upshot. I don't think I can make that determination. I don't think I can rule that a reasonable jury would be able to make that inference.

RP 50. What the court fails to do is view the inference in the light most favorable to the non-moving party: Mackey. The court is required under Washington law to view the inference of a mere two

weeks between Mackey filing a complaint with her store manager about being berated and being terminated because of an investigation of her work practices, none of which had ever resulted in any complaints against her let alone any disciplinary action taken against her, in the light most favorable to Mackey which requires denying Defendants' motion for summary judgment. This is not a situation where Mackey had been disciplined for some action in her past eight years of employment by Defendant Home Depot; this situation is that Mackey made a complaint about actions done to her which affected her disabilities and Home Depot retaliating by terminating her because of employment practices of which she had never been disciplined. A substantial period of time did not pass between Mackey's complaint and her termination: one week passed. There is a clear inference of discrimination based on the timing and Home Depot's actions.

C. The Trial Court Failed to Properly Apply Washington Law to Mackey's Retaliation Claim

It is unlawful for an employer to “discharge, expel, or otherwise discriminate against any person because he or she has (1) opposed any practices forbidden [by RCW 49.60]. RCW 49.60.210(1). In order to prevail on a case of retaliation, Mackey must show that she (1) engaged in statutorily protected activity; (2) an adverse employment action was taken; and (3) the statutorily protected activity was a substantial factor in the employer’s adverse employment decisions. *Fancom v. Costco Wholesale Corp.*, 98 Wn.App. 845, 861-62, 991 P.2d 1182, 1191 (Wash. App. 2000).

The Washington Supreme Court has recently clarified the standard for establishing a causal link between protected status and an adverse employment action. *Cornwell v. Microsoft Corp.*, 192 Wn.2d 403, 430 P.3d 229 (2018). In *Cornwell* the Court held that so long as the employer knew or suspected that the employee had engaged in prior protected activity that was sufficient to defeat summary judgment. In that case Cornwell had previously filed a sex discrimination lawsuit that was resolved, and Cornwell was re-assigned to a new manager. *Id.* at 406-407. Seven years later

Cornwell was about to be assigned a new mentor, but that mentor reported directly to the manager who she had previously accused of discrimination. *Id.* at 407. Cornwell disclosed to her new manager, Blake, that she had filed a lawsuit regarding this individual, but did not provide more details due to a confidentiality agreement. *Id.* Shortly after disclosing this fact to her manager Cornwell was given a performance review. *Id.* Cornwell’s manager informed her she would be rated a “4” which was the second-lowest rating she could receive, but ultimately the manager rated Cornwell a “5”, the lowest possible rating. *Id.* 407-409. Blake enlisted the help of her immediate supervisor, McKinley in deciding on this rating. *Id.* at 407-408. The manager gave Cornwell this rating despite the fact that Cornwell had received good performance ratings and promotions over her years working for Microsoft, and positive feedback from Cornwell’s co-workers. *Id.* Cornwell was then laid off. *Id.* at 409.

The Court held that an employer only needs to know or suspect that an employee engaged in statutorily protected activity in order to establish a reasonable inference that the protected activity was a

substantial factor in subsequent adverse employment actions. *Id.* at 416. The Court stated, “[g]iven Blake and McKinley’s knowledge of the suit and the poor performance rating and termination that followed shortly thereafter, it is a reasonable inference that these actions were in retaliation for Cornwell’s previous lawsuit.” *Id.* 415-416 (footnote omitted).

Mackey’s case is directly analogous to *Cornwell*. In the present case, Mackey clearly engaged in statutorily protected activity. She objected to Krall’s treatment of her, and told Krall that she was not able to respond due to her disabilities. Krall only stopped berating Mackey when another manager came into the room and told Krall that her actions were inappropriate. CP 103, 133. The subsequent day, Mackey complained about Krall’s actions with Home Depot’s store manager, and stating how the effects of her disability made it impossible for her to respond to Krall. CP 103, 133. Less than a week later an investigation into Mackey’s discounting practices began. CP 142. Mackey was then terminated approximately a week of the investigation started.

As in *Cornwell* this sequence of events establishes a clear inference of retaliation. Like in *Cornwell*, Mackey engaged in protected activity, namely complaining about how her supervisor's treatment negatively impacted Mackey's disabilities. Defendant Home Depot knew or suspected that Mackey had engaged in this protected activity. Shortly after Mackey engaged in this protected activity she was subjected to an investigation, and ultimately terminated. Similarly to *Cornwell*, Mackey had a good employment history, receiving high ratings and awards for her job performance.

In fact the timing of events in Mackey's case is even more suggestive of retaliation than that in *Cornwell*. In that case *Cornwell* told Blake about her previous lawsuit in late 2011. She received her "5" rating in July of 2012, and was terminated in September of 2012. *Id.* at 416, n. 9. Mackey, in contrast, complained about Krall on or about May 27th. The investigation into Mackey's discounting practices was started on October 2nd, and she was ultimately terminated on October 9th.

The trial court, however, dismissed the reasonable inference that arises from this sequence of events in granting defendants' Motion for Summary Judgment. Under the standard articulated in *Cornwell*, the trial court's decision should be reversed.

D. Mackey's Discharge was in Violation of Public Policy

Washington courts have long recognized an exception to the "at will" doctrine for terminations that violate a public policy. Specifically, Washington courts have held that a termination may be found in violation of public policy where: (1) the discharge was the result of refusing to commit an illegal act; (2) the discharge resulted due to the employee performing a public duty or obligation; (3) the termination resulted because the employee exercised a legal right or privilege; and (4) the discharge was premised on employee "whistleblowing" activity. *Dicomes v. State*, 113 Wn.2d 612, 618, 782 P2d 1002 (Wash. 1989). Mackey's termination was a direct result of her whistleblowing activity. Mackey needs to prove a casual connection between her engagement in protected activity and her

termination. *Delahunty v. Cahoon*, 66 Wn.App. 829, 839 (Wash. App. 1992).

Washington courts recognize that there is rarely direct evidence that the termination of an employee was a result of that employee's protected activity. Therefore, courts need to look to circumstantial evidence to determine if there is a casual link between the protected activity and the termination. Here, the time between Mackey alerting the store manager of being berated by her supervisor and Mackey being terminated is less than two weeks. Moreover, Mackey had a stellar employment history with Home Depot for eight years prior to being terminated.

E. The Trial Court Failed to Properly Analyze Whether Defendants' Justification for Terminating Mackey was Made in Good Faith

As articulated above, Mackey performed the tasks of her employment without question, complaint or discipline in the eight years she worked for Home Depot. Then she complained to the store manager of being berated by Defendant Krall, which had negative as

effects on her disability. Defendants contend that its investigation shows that Mackey gave inappropriate discounts; however, as Mackey clearly articulated in her declaration submitted in support of her opposition to Defendants' motion, she complied with Home Depot's rules and policies regarding discounts and the few occasions where she realized that she gave an additional discount or that a customer received an additional discount, she alerted management of Home Depot immediately. CP 101-102, 131.

In granting Defendants' motion, the court below failed to view all of the facts in the light most favorable to Mackey even though she was the non-moving party. This is clear error. The trial court summarily determined that defendants acted in good faith with their investigation into Mackey's discounts. An employer may terminate an employee for good cause, but that good cause must be established by a preponderance of the evidence. *Criswell v. W. Airlines, Inc.*, 709 F.2d 544, 552 (9th Cir. 1983). Where an employee shows that there is a dispute as to whether was good cause for the termination, then the employer should not be granted summary

judgment. *Parris v. Wyndham Vacations Resorts Inc.* 979 F.Supp.2d 1069, 1081 (D. Hawaii 2013).

In reaching its conclusion the trial court ignored all of the facts that Mackey produced to create a genuine issue of material fact as to whether defendants had good cause to terminate her. The trial court failed to consider Mackey's explanation of how she performed the discounting process, that she asserted she did so within the policy parameters established by Defendant Home Depot, and that she obtained her supervisor's permission before she deviated from the established parameters. When these facts are combined with the fact that Mackey had worked for Defendant Home Depot for 8 years, had received high performance evaluation ratings, and had never been disciplined during her tenure with Defendant Home Depot. These facts, on their own or taken together, are sufficient to create a genuine issue of material fact as to whether Defendant Home Depot performed a good faith investigation that justified Mackey's termination.

F. The Trial Court Failed to Apply Washington Case Law Regarding Reasonable Accommodation

Washington law requires that a party alleging a failure to provide a reasonable accommodation prove: (1) the party is disabled; (2) that she is qualified to perform the essential functions of the job; (3) that she gave her employer notice of her disability and its accompanying limitations and (4) upon notice, the employer failed to accommodate the disability. *Riehl* at 145. In short, the employer must affirmatively adopt measures that are available and necessary to accommodate the employee's disability. *Id.* There is no dispute that Mackey was disabled, that she was qualified to perform the essential functions of the job, and that she gave notice to Home Depot of her disability and its accompanying limitations. The parties do dispute whether defendant Home Depot's accommodation of allowing Mackey to ask others to help her perform the essential tasks of her job was sufficient. As articulated at argument on the motion, it undermines the purpose of reasonable accommodation to require an employee on their own to go out and get help from co-workers to

perform the tasks which she was assigned. RP 20. Home Depot did not actually provide Mackey with any accommodation, in fact after Mackey told Home Depot of her physical disability, Home Depot employees continued to assign Mackey tasks which she could not perform as a result of her disability. CP 141.

In *Kermini v. International Health Care Props. XXIII Ltd. Pshp.*, the Washington Court of Appeals held that an employee with lifting restrictions could be entitled to a reasonable accommodation of additional staff. 1999 Wash. App. LEXIS 581, *11-13 (Wash. App. 1999). Mr. Kermini was a charge nurse who hurt his back while moving a patient. His doctor cleared him to return to work with lifting restrictions, however, Mr. Kermini's employer insisted that lifting was an essential function of the job. His employer even provided him a mechanical lifting device to use to lift patients, but Mr. Kermini refused to use it. Mr. Kermini was ultimately terminated. The Court held that a reasonable jury could find that a reasonable accommodation in the form of hiring more assistants to

help Mr. Kermini was feasible and that the employer failed to provide it. *Id.* at 13.

The record of the instant case tracks closely with *Kermini*. Mackey requested a reasonable accommodation that defendants provide additional staffing to help her with the lifting tasks defendants assigned to her. Defendants contend that they did accommodate Mackey by allowing her, on her own, to ask other employees for help lifting items. However, defendants did not take any affirmative step to provide Mackey with an accommodation. Instead they merely sent her out to accommodate herself.

The trial court summarily determined that defendants' accommodation was reasonable, and met Mackey's needs. In doing so it failed to consider the facts, and reasonable inferences from all the facts, that their accommodation did not meet Mackey's needs. This is reversible error by the trial court.

IV. CONCLUSION

The trial court failed to properly consider the inferences of Defendants' actions in the light most favorable to Mackey as well as

Defendants' failure to reasonably accommodate Mackey. These failures conflict with the case law concerning discrimination and requirements for employers to provide reasonable accommodations. This court must reverse that judgment and remand the matter for trial on the merits.

Dated: January 31, 2019

Respectfully submitted,

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By: 

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Attorney for Plaintiff/Appellant

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LORI MACKEY

Appellant

v.

CERTIFICATE OF SERVICE
RE APPELLANT'S BRIEF

HOME DEPOT USA, INC. dba THE
HOME DEPOT STORE #4718, JAMIE
KRALL, and JENNIFER ILES

Respondants.

CERTIFICATE OF SERVICE

I hereby certify that I served the BRIEF OF APPELLANT on the below listed persons:

D. Michael Reilly
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PO Box 91302
Seattle, WA 98111-9402

By causing a full, true and correct copy thereof to be MAILED by regular mail in a sealed, postage-paid envelope, addressed as shown above, and deposited with the US Postal Service in Vancouver, WA on the date set forth below.

DATED this 31st day of January, 2019.


JUDY L. FRYER, Paralegal

GOOD LAW CLINIC

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