IN THE SUPREME COURT OF IOWA

No. 23-1371
District Court No. LACL152315

SILVIA R. CIANZIO,
Plaintiff-Appellant,

vs.

IOWA STATE UNIVERSITY, STATE OF IOWA AND BOARD OF REGENTS, STATE OF IOWA,
Defendants-Appellees.

ON APPEAL FROM THE IOWA DISTRICT COURT IN
POLK COUNTY CASE NO. LACL152315
ORDER DATED AUGUST 2, 2023

THE HONORABLE HEATHER LAUBER
DISTRICT COURT JUDGE

PLAINTIFF-APPELLANT'S FINAL REPLY BRIEF

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ARGUMENT

Defendants ask the Court to read certain language completely out of Iowa's Equal Pay Act and to usurp the role of the Legislature in weighing policy considerations and coming to its own conclusion regarding the appropriate measure of damages under the Act. Defendants' argument that a claim under section 216.6A should be analyzed in the same manner as a claim under section 216.6—despite different language deliberately chosen by the Legislature—is without support. This issue has been decided by at least five different state and federal district courts in addition to the district court in this case, and all five judges held that: 1) the damage provision applicable to claims under section 216.6A is unambiguous, and 2) a claimant who successfully proves her claim is entitled to recover double or treble damages during the entire period of discrimination and is not limited to the 300 day administrative filing period.

I. THE EXPRESS LANGUAGE OF THE STATUTE MEASURES DAMAGES BY USING "THE PERIOD OF TIME FOR WHICH THE COMPLAINANT HAS BEEN DISCRIMINATED AGAINST" AND ADOPTS THE CONTINUING VIOLATION DOCTRINE FOR CLAIMS UNDER SECTION 216.6A

In 2009, the Iowa Legislature enacted the Iowa Equal Pay Act providing a new cause of action for unequal pay regardless of intent. The Act provides that an administrative complaint is timely filed if it is filed within

300 days of some of the prohibited conduct, including payment of a paycheck impacted by a prior pay decision. The Act also provides that a successful claimant can recover enhanced damages of two or three times the wage differential for the period of discrimination defined as the payment of unequal wages. By enacting these two provisions, the Iowa Legislature provided that the continuing violations doctrine applied to unequal pay claims brought pursuant to section 216.6A.

Iowa's Equal Pay Act was enacted just months after Congress amended Title VII by enacting the Ledbetter Fair Pay Act to overturn *Ledbetter v. Goodyear Tire & Rubber Co.*, 550 U.S. 618 (2007). Defendants admit both Acts were enacted to "fix the Ledbetter problem" but fail to acknowledge the entirety of the "Ledbetter problem" the Act was intended to fix. In *Ledbetter*, the US Supreme Court, applying *Nat'l R.R. Passenger Corp. v. Morgan*, 536 U.S. 101, 110 (2002), concluded that the continuing violation doctrine did not apply to claims for intentional wage discrimination under Title VII. *Ledbetter*, 550 U.S. at 628. The continuing violations doctrine not only relates to the timely filing requirement, but it also governs the period of damage recovery for a successful plaintiff. The continuing violation doctrine allows an employee to recover damages for the entire period of the discriminatory

conduct provided that some of the conduct occurred during the 300 days preceding the filing of an administrative complaint. *Morgan*, 536 U.S at 110.

Whether the continuing violation doctrine applies to certain claims is a matter of statutory interpretation. *Nat'l R.R. Passenger Corp. v. Morgan*, 536 U.S. 101, 110 (2002). As illustrated by the Ledbetter Fair Pay Act and the Iowa Equal Pay Act, the Legislature has the authority to provide by statute that certain claims are governed by the continuing violation doctrine. *Id*. "The [Fair Pay Act] was passed to restore the law that was in place prior to the *Ledbetter* decision." *Mikula v. Allegheny Cnty. of PA*, 583 F.3d 181, 185 (3d Cir. 2009). Before the enactment of Iowa's EPA, the Iowa Supreme Court had not previously addressed the continuing violation doctrine's applicability to equal pay claims; however, it is obvious from the nearly identical language and structure used by the Iowa Legislature that the intent of the act was to make clear that the federal pre-Ledbetter law, applying continuing violations doctrine to wage claims, should apply to claims under section 216.6A.

The Legislature is presumed to know the state of the law at the time of enactment. *State v. Freeman*, 705 N.W.2d 286, 291 (Iowa 2005). Therefore, the Legislature in this case is presumed to know that the continuing violations doctrine allows recovery for the entire period of discrimination if certain acts occurred within the limitations period. *Farmland Foods, Inc. v. Dubuque*

Hum. Rts. Comm'n, 672 N.W.2d 733, 741 (Iowa 2003). The language chosen by the Legislature indicates its intent that the continuing violations doctrine apply to claims under section 216.6A. The language "period of time for which the complainant has been discriminated against" in the damage provision in 216.15(9)(a)(9), along with the paycheck accrual language contained in section 216.6A, is a clear indication of the legislature's intent to adopt the continuing violation doctrine for claims under section 216.6A.

A. The Court in *Dindinger* expressly stated that section 216.6A adopted the continuing violations doctrine.

Defendants rely on language from *Dindinger* applicable only to claims under section 216.6 in attempt to avoid the obvious conclusion that in adopting section 216.6A and the accompanying remedial language contained in section 216.15, the Legislature expressly provided that the continuing violation doctrine would apply to claims under section 216.6A. The Court in *Dindinger*, in fact, stated the opposite. "**Except for the new cause of action added in 2009**, the ICRA does not have language … that would allow the claimant to revert to the date when the employer initially discriminated against the employee." *Dindinger v. Allsteel, Inc.*, 860 N.W.2d 557, 575 (Iowa 2015).

Whether the continuing violation doctrine applies to certain claims turns, in part, on the interpretation of the phrase "unfair or discriminatory practice" *Id*. and *Dindinger*. The continuing violation doctrine applies to

claims of hostile work environment because courts have interpreted a hostile work environment as a "single unlawful employment practice." *Morgan*, 536 U.S. at 118. Section 216.6A defines the unfair or discriminatory practice prohibited by this section as paying wages to such employee at a rate less than the rate paid to other employees. The section goes on to state:

> For purposes of this subsection, an unfair or discriminatory practice **occurs** when a discriminatory pay decision or other practice is adopted, when an individual becomes subject to a discriminatory pay decision or other practice, or when an individual is affected by application of a discriminatory pay decision or other practice, including each time wages, benefits, or other compensation is paid . . . .
> Iowa Code section 216.6A(2)(b).

"[S]ection 216.6A defines discrimination as the act of paying lower wages." *Dindinger*, 860 N.W.2d at 564.

The language from *Dindinger* relied on by Defendants makes clear that the discreet act limitation only applies to claims brought under section 216.6. The Court in *Dindinger* stated, "Paying an employee in a protected class less than other employees, if done with discriminatory intent, is *always* separately actionable. It does not matter how many times the conduct occurred, and one does not need to consider other conduct to determine whether the employer has violated the law." *Dindinger* at 572 and Defendants' proof brief at p. 12. This statement refers only to claims under section 216.6 as it applies to

intentional wage discrimination whereas the Court made clear in *Dindinger* that section 216.6A prohibits non-intentional wage discrimination.

B. The phrase "period of time for which the complainant has been discriminated against" would be meaningless if Plaintiff was limited to 300 days of recovery.

Section 216.15 provides in relevant part:

> For the purposes of this subsection and pursuant to the provisions of this chapter "remedial action" includes but is not limited to the following:
> …
> > For an unfair or discriminatory practice relating to wage discrimination pursuant to section 216.6A, payment to the complainant of damages for an injury caused by the discriminatory or unfair practice which damages shall include but are not limited to court costs, reasonable attorney fees, and either of the following:
> >
> > (a) An amount equal to two[or three] times the wage differential paid to another employee compared to the complainant for the period of time for which the complainant has been discriminated against.

Iowa Code § 216.15.

If the Legislature had intended that recovery of enhanced damages be limited to only the 300 days preceding the filing of the administrative complaint, the language "period of time for which the complainant has been discriminated against" would have been unnecessary. Iowa Code section 216.15. Damages under the ICRA are generally limited to actual damages incurred from the 300 days prior to the filing of an administrative complaint. *Farmland Foods*, 672 N.W.2d at 741. If the Legislature had intended that the

300-day limitation apply to claims under section 216.6A, it would have said nothing about the "period of time" used to calculate damages. "We generally read legislation in a manner to avoid rendering portions of a statute superfluous or meaningless." *Beverage v. Alcoa, Inc.*, 975 N.W.2d 670, 685 (Iowa 2022). The Legislature enacted a specific damage provision only applicable to claims under section 216.6A, evidencing an intent to allow different damages for claims under section 216.6A, and chose to calculate damages using the wage differential during the entire period of discrimination. Defendants' proposed interpretation would simply write out the language deliberately chosen by the Legislature. The Court cannot read portions out of a statute under the guise of statutory interpretation. *Little v. Davis*, 974 N.W.2d 70, 75 (Iowa 2022).

The statutory history of Iowa's Equal Pay Act provides further evidence that the language "period of time for which the complainant has been discriminated against" was intentionally chosen and means exactly what it says. When the Equal Pay Act was introduced in both the Iowa House and Iowa Senate, one purpose of the Bill was listed as "to award damages to a person subject to wage discrimination in an amount triple the wage differential paid to the complainant for the entirety of the time for which the complainant has been discriminated against." SSB1089 (2009) and HSB73 (2009).

C. Multiple state and federal district courts have rejected Defendants' argument.

Multiple state and federal courts have rejected Defendants' argument that recovery is limited to the 300 days prior to the filing of an administrative complaint, determining that such an interpretation would be contrary to the plain language of the statute and this Court's prior opinion in *Dindinger*. In the *Dindinger* case, the Honorable Stephanie Rose, following this Court's answers to certified questions, concluded that the plaintiffs could recover damages dating back to the effective date of the statute—June 1, 2009—which was two years and two months before the filing of the administrative complaint. *Dindinger v. Allsteel, Inc.*, 2015 WL 11143144, at *14 (S.D. Iowa June 8, 2015) (ruling on motion for summary judgment).

Similarly, in *Rife v. Allsteel*, the Honorable Rebecca Goodgame Ebinger rejected an argument identical to that advanced by Defendants, stating:

> The Iowa Supreme Court's interpretation and the plain language of Iowa Code §§ 216.6A and 216.15(9)(a)(9), conflict with Defendants' claim that the phrase 'period of time for which the complainant has been discriminated against' in Iowa Code § 216.15(9)(a)(9) is limited to the 300 days set forth in Iowa Code § 216.15(13).
> *Rife v. Allsteel*, Case 3:19-cv-00023-RGE-CFB Document 70 (S.D. Iowa July 15, 2020) (ruling on summary judgment) (last accessed via PACER on February 27, 2024).

Iowa District Courts, with the exception of the district court in this case, have also universally rejected the limitation that Defendants advocate for here. In *Jochims v. HMSCSD*, the Honorable John Sandy concluded:

> The statutes at play are clear. Plaintiffs cannot sue except within 300 days of the discriminatory act. However, Plaintiffs can receive damages for the entire period of the discrimination. Attempting to limit Iowa Code §216.15(9)(a)(9)'s damages to the 300-day statute of limitations would read the words "for the period of time for which the complainant has been discriminated against" out of the statute. The statue does not specify "for the period of time" is 300 days. This Court will not create language in a statute that does not exist.
> *Jochims v. HMSCSD et al*, Case No. LACV025330 (Iowa Dist. Ct. O'Brien County June 29, 2023) (ruling on motion to reconsider, enlarge or amend) (last accessed via EMS February 27, 2024).

In *Selden v. DMACC*, the Honorable Scott Rosenberg stated, "[T]he Court concludes that … the plain meaning of sections 216.15(9)(a),(b) support the interpretation that as long as one instance of discrimination was within the 300 days, the Plaintiff can bring forward a claim for the entire period." *Selden v. DMACC*, Case No. LACL147358 (Iowa Dist. Ct. Polk County October 1, 2021) (ruling on motion for summary judgment) (last accessed via EMS February 27, 2024).

Finally, in *McComas v. Iowa*, Case No. LACL152930 (Iowa Dist. Ct. Polk County October 1, 2021) (ruling on motion for summary judgment) (last accessed via EMS February 27, 2024), the Honorable Joseph Seidlin rejected

the argument advanced by the same defendant as in this case, noting that the district court in this case had rejected the reasoning of the Iowa Supreme Court and stating that he found the following language in *Dindinger* persuasive, whether dicta or not:

> In 2009, the legislature provided a different statute of limitations for claims under Iowa Code section 216.6A, allowing the employee to recover "for the period of time for which the complainant has been discriminated against." 2009 Iowa Acts ch. 96, § 3 (codified at Iowa Code § 216.15(9)(*a*)(9)(a)). This language appears to allow the employee to recover for the entire period of discrimination, so long as some equal pay violation occurred within 300 days of the employee's administrative complaint.
> *Dindinger*, 860 N.W.2d at 572 fn 7.

While this Court is not bound by the decisions of state or federal district courts, the fact that at least five judges have found the statutory language at issue to be unambiguous and have rejected the same argument advanced by Defendants in this case is strong evidence that no ambiguity exists. A statute is only ambiguous "if reasonable minds could differ or be uncertain as to the meaning of the statute based on the context of the statute." *Estate of Butterfield v. Chautauqua Guest Home, Inc.*, 987 N.W.2d 834, 838 (Iowa 2023) (citations omitted). The fact that Iowa's EPA was enacted just months after a nearly identical amendment to Title VII, which provided for a recovery period of two years, is further evidence that the Iowa Legislature intended to specifically

identify a period of recovery and that period was the entire period of discrimination.

II. IT IS THE LEGISLATURE'S ROLE AND NOT THE COURT'S TO DETERMINE THE APPROPRIATE DAMAGES FOR VIOLATION OF SECTION 216.6A

The language used by the Legislature is clear and so Defendants, in their briefing, attempt to advance various policy arguments in support of their proposed "interpretation" of the statute.

> The Iowa legislature is the appropriate body to make the policy judgments … We will not adopt the procedure through the guise of statutory interpretation. …It is not the role of [the] court to alter a statutory requirement in order to effect policy considerations that are vested in the legislature. Rather, policy arguments to amend the statute should be directed to the legislature.
> *In re Marriage of Thatcher*, 864 N.W.2d 533, 546 (Iowa 2015) (citations omitted).

Iowa's Equal Pay Act was enacted in 2009 stating that "it is the policy of this state to correct and, as rapidly as possible, to eliminate, discriminatory wage practices." Iowa Code section 216.6A. The legislature determined that the best way to accomplish this goal was through enactment of an enhanced damages provision that allows for two or three times the wage differential during the entire period of discrimination. The Legislature was well within its authority to do so. In 2017, this Court stated in *Dindinger* that the language at issue in this case "appears to allow the employee to recover for the entire

period of discrimination, so long as some equal pay violation occurred within 300 days of the employee's administrative complaint." *Dindinger*, 860 N.W.2d at 572. The Legislature has not amended the statute since *Dindinger* to limit the recovery period. At least five district courts have concluded since *Dindinger* that the language at issue allows recovery of enhanced damages during the entire period of discrimination and is not limited to the 300 days prior to filing of the administrative complaint. The Legislature has not amended the statute in response to these rulings. In fact, the Legislature considered and rejected a proposed amendment that would limit the recovery period to two years.

"Under the doctrine of legislative acquiescence, we presume the legislature is aware of our cases that interpret its statutes. When many years pass following such a case without a legislative response, we assume the legislature has acquiesced in our interpretation." *State v. Montgomery*, 966 N.W.2d 641, 651 (Iowa 2021) (citations omitted).

> This Court in interpreting the damage provision of the ICRA has stated: Our task is to ascertain the intent of our legislature. This task is not only tied to the separation-of-powers doctrine, but it is rooted in the underlying principles that the legislature makes the law and the courts interpret the law.
> …
> The path we follow in this case is one primarily built on the venerable principles of stare decisis and legislative acquiescence. We are slow to depart from stare decisis and only do so under the most cogent circumstances. Moreover, we presume the

> legislature is aware of our cases that interpret its statutes. …When many years pass following such a case without a legislative response, we assume the legislature has acquiesced in our interpretation.
> *Ackelson v. Manley Toy Direct, L.L.C.,* 832 N.W.2d 678, 687–88 (Iowa 2013).

It is not the Court's role, as the district court did here, to weigh competing policy interests and determine the appropriate period of recovery. The Legislature has already done that and if the Legislature changes its mind as to the time period for recovery, the Legislature can amend the ICRA to reflect any new policy determination.

The policy set by the Legislature is far from absurd as argued by Defendants. In fact, the interpretation made by the district court and the interpretation Defendants argue for would completely undermine the purpose of the Act by failing to provide any meaningful motivation for employers to eliminate wage discrimination. This case is an excellent example proving Defendants' proposed interpretation is ridiculous. Silvia Cianzio was paid between $11,276 and $46,049 less annually than male professors performing equal work, meaning Defendants had an annual savings of between $11,276 and $46,049 as a result of engaging in prohibited wage discrimination. From July 2009 through the date of her retirement, Defendants saved between $129,674 and $529,563.50 as a result of prohibited wage discrimination. Under Defendants' proposed interpretation for a non-willful violation,

Cianzio could only recover between $18,793.34 and $76,748.33.[1] Under this interpretation, Defendants still maintain a substantial financial benefit as a result of engaging in wage discrimination. There would be no motivation for employers to equalize pay.

This interpretation is even more ridiculous when considering the realities of the workplace. Employers always know what employees are being paid in comparison to one another, while employees rarely have access to such information. Employers do not need an employee to complain about wage discrimination for an employer to be aware that it is happening. Defendants' claim that employees will simply sit on their claims accruing damages to the detriment of unsuspecting employers is ridiculous.[2] "The employer always has the ability to reexamine and correct an improper pay-setting decision." *Dindinger*, 860 N.W.2d at 573. In fact, when the employer does remedy unequal pay, the employer starts the clock running for the deadline for filing an administrative complaint. An employer is not powerless to avoid liability

[1]This calculation assumes Cianzio filed her administrative complaint immediately at the end of her employment and therefore could recover for the full 300 days preceding the filing of her administrative complaint.

[2] Notably, Cianzio brought the wage discrimination at issue in this case to the attention of her employers when she discovered it, and her employers chose to do nothing. If Defendants had in fact remedied the situation, they would have started the clock for Cianzio to file an administrative complaint.

for years of violating section 216.6A; in fact, an employer has all the power to avoid this—they simply must start paying women equally to men for performing equal work. The enhanced damage provision is intended to provide this motivation for employers and a prudent employer would have remedied unequal pay in 2009 when the Statute was enacted. Those that did not are at risk for being held liable for all years in which they violated section 216.6A.

CONCLUSION

For these reasons and those set forth in Appellant's brief, Plaintiff-Appellant Silvia Cianzio respectfully requests that this Court overrule the District Court's grant of partial motion to dismiss limiting Cianzio's recovery to two years preceding the filing of her administrative complaint and order that Plaintiff Cianzio is entitled to pursue claims for violation of Iowa Code section 216.6A dating back to July 10, 2009, the date on which Iowa Code section 216.6A went into effect.

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CERTIFICATE OF COMPLIANCE

This reply brief complies with the type-volume limitation of Iowa R. App. P. 6.903(1)(g)(1) because this reply brief contains 3,562 words, excluding the parts of the reply brief exempted by Iowa R. App. P. 6.903(1)(g)(1). This reply brief complies with the typeface requirements of Iowa R. App. P. 6.903(1)(e) and the typestyle requirements of Iowa R. App. P. 6.903(1)(f) because This reply brief has been prepared in a proportionally spaced typeface using Microsoft Word in Times New Roman, size 14.

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STATEMENT OF COSTS

The undersigned certifies that the cost for printing and duplicating paper copies of this reply brief was $0.00.

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CERTIFICATE OF FILING AND SERVICE

I certify that I filed this reply brief with the Clerk of the Iowa Supreme Court using the Iowa Electronic Document Management System on March 5, 2024.

I further certify that on March 5, 2024, a copy of the reply brief was served using EDMS pursuant to Iowa R. App. P. 6.701 to:

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