

NONPRECEDENTIAL DISPOSITION

To be cited only in accordance with FED. R. APP. P. 32.1

United States Court of Appeals**For the Seventh Circuit****Chicago, Illinois 60604**

Submitted January 13, 2026*

Decided January 13, 2026

BeforeMICHAEL B. BRENNAN, *Chief Judge*MICHAEL Y. SCUDDER, *Circuit Judge*NANCY L. MALDONADO, *Circuit Judge*

No. 25-1853

PAKI BROWN,
*Plaintiff-Appellant,**v.*AMERICAN FOODS GROUP, LLC
and GREEN BAY DRESSED BEEF, LLC,
*Defendants-Appellees.*Appeal from the United States District
Court for the Eastern District of Wisconsin.

No. 1:23-cv-01623-WCG

William C. Griesbach,
*Judge.***ORDER**

Paki Brown sued his former employers, American Foods Group, LLC, and Green Bay Dressed Beef, LLC, alleging that they fired him in retaliation for his complaint about a language barrier with his trainer in violation of Title VII. *See* 42 U.S.C. § 2000e-3(a). The district court entered summary judgment for the defendants,

* We have agreed to decide the case without oral argument because the briefs and record adequately present the facts and legal arguments, and oral argument would not significantly aid the court. FED. R. APP. P. 34(a)(2)(C).

concluding that Brown failed to present evidence that he engaged in a protected activity. We affirm.

Because the case was resolved on cross-motions for summary judgment, we recount the facts in the light most favorable to the losing party—here, Brown. *See Holcomb v. Freedman Anselmo Lindberg, LLC*, 900 F.3d 990, 992 (7th Cir. 2018). Brown began working for the defendants in March 2023. After his first week of training, Brown told his trainer that he was having difficulty understanding him: The trainer spoke English but is a native Spanish speaker. After Brown and the trainer were unable to resolve the issue, Brown raised his concern with the trainer’s supervisor, who then escalated it to a manager.

Brown then met with the supervisor and manager. During the meeting, the manager asked whether the trainer had been speaking Spanish when communicating with Brown. Brown responded that the trainer had been speaking English. The manager then asked, “You understand English, right?” Offended by this comment, Brown stated that he needed to “get out of [t]here,” walked past the manager and supervisor, and left the meeting without explanation. (The manager and supervisor attested that Brown became confrontational and hostile during the meeting, cursing at them and pointing his finger in their faces. But to the extent that their accounts conflict with Brown’s sworn deposition testimony, we do not credit them here.) Brown was fired within a day of the meeting.

Brown sued his former employers, alleging that they fired him in retaliation for complaining about an unlawful employment practice. *See* 42 U.S.C. § 2000e-3(a). Specifically, Brown asserted that his employer discriminated against him based on his national origin by assigning to him a trainer whose English he could not understand. The parties both moved for summary judgment, and Brown failed to respond to the defendants’ proposed findings of fact, which the court deemed admitted. The court granted the defendants’ motion and concluded that Brown had not presented evidence from which a reasonable jury could conclude that he complained about any unlawful employment practice. The court accepted that disparate treatment based on language may sometimes constitute national-origin discrimination. The court assumed that Brown believed he was opposing an unlawful employment practice when he complained about his trainer, but it concluded that his belief was not objectively reasonable. It explained that the assignment of a trainer whose English Brown had difficulty understanding alone did not constitute national-origin discrimination. The

court noted that Brown had presented no evidence that the defendants restricted him from speaking English or treated him differently because he spoke English.

Brown appeals the district court's grant of summary judgment, which we review de novo. *See Logan v. City of Chicago*, 4 F.4th 529, 536 (7th Cir. 2021). Title VII prohibits an employer from retaliating against an employee "because he has opposed any practice made an unlawful employment practice" by the statute. 42 U.S.C. § 2000e-3(a). To defeat summary judgment, Brown needed some evidence from which a jury could conclude that (1) he engaged in statutorily protected activity, (2) he suffered an adverse employment action, and (3) a causal connection existed between the two. *Logan*, 529 F.4th at 538. To establish that he engaged in a protected activity, Brown "must not only have a subjective (sincere, good faith) belief that he opposed an unlawful practice; his belief must also be objectively reasonable, which means that the complaint must involve discrimination that is prohibited by Title VII." *Id.* (quoting *Scheidler v. Indiana*, 914 F.3d 535, 542 (7th Cir. 2019)).

The objective reasonableness of Brown's belief is assessed by examining whether the conduct "falls into the category of conduct prohibited by the statute." *Id.* (quoting *Lord v. High Voltage Software, Inc.*, 839 F.3d 556, 563 (7th Cir. 2016)). In other words, Brown must show that the complained-of conduct entailed a motive that Title VII forbids—as relevant here, discrimination based on national origin. *See id.* at 538; 42 U.S.C. § 2000e-2(a).

Brown has developed no argument on appeal engaging with the district court's reasoning that the assignment of the trainer did not amount to an unlawful employment practice prohibited by Title VII. So any argument along those lines is waived. *See Greenbank v. Great Am. Assurance Co.*, 47 F.4th 618, 629 (7th Cir. 2022). In any event, we agree with the district court that Brown's complaint did not involve national-origin discrimination. Brown complained that he had been assigned a trainer whose English he had difficulty understanding. Whether this assignment may have resulted in Brown receiving ineffective training, it does not reflect conduct proscribed by Title VII. *See Murphy v. Caterpillar Inc.*, 140 F.4th 900, 914–15 (7th Cir. 2025) (explaining that courts do not "second-guess[] employers' business judgments" in the absence of discriminatory intent). Brown spoke English at work, and he presented no evidence that the defendants placed any restrictions on his use of English or otherwise treated him differently than other employees because he spoke English.

Moreover, even if Brown could establish that he complained about discrimination prohibited by Title VII, he has not presented sufficient evidence from

which a reasonable jury could infer that he was fired because of his complaint. Brown relies solely on temporal proximity, pointing out that he was fired within a day of his complaint. While timing can support an inference of causation, *see Loudermilk v. Best Pallet Co., LLC*, 636 F.3d 312, 315 (7th Cir. 2011), it is rarely sufficient alone, especially where there is an intervening event and no evidence of pretext. *See Smeigh v. Johns Manville, Inc.*, 643 F.3d 554, 561 (7th Cir. 2011). Here, the manager said he fired Brown because Brown became hostile during the meeting to discuss his complaint. Brown contests the manager's account of the meeting, but he does not dispute that he walked out of the meeting without explanation. Brown has presented no evidence that the proffered reason for his firing was pretextual. *See Crain v. McDonough*, 63 F.4th 585, 593 (7th Cir. 2023) ("Pretext is not 'just faulty reasoning or mistaken judgment on the part of the employer; it is [a] lie, specifically a phony reason for some action.'" (quoting *Burton v. Bd. of Regents of Univ. of Wis. Sys.*, 851 F.3d 690, 698 (7th Cir. 2017))).

Finally, Brown mentions ten errors he believes the district court committed variously related to discovery and docket management. For example, he says that the court abused its discretion by denying Brown's request to compel discovery related to his allegations of systemic discrimination. But all of these arguments are "perfunctory and undeveloped," so they are waived. *Crespo v. Colvin*, 824 F.3d 667, 674 (7th Cir. 2016).

AFFIRMED