IN THE SUPREME COURT OF THE STATE OF MONTANA
Cause: DA 22-0467

TESSA ZOLNIKOV,
Petitioner/Appellant,

v.

NATIONAL BOARD OF MEDICAL EXAMINERS,
Respondent/Appellee.

APPELLEE'S RESPONSE BRIEF

On Appeal from the Montana Fourteenth Judicial District Court
Musselshell County
District Court Cause No. DV 20-37
Honorable Randal I. Spaulding, Presiding

APPEARANCES:

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INTRODUCTION

This is a straightforward appeal. Petitioner-Appellant Tessa Zolnikov ("Ms. Zolnikov") filed a discrimination complaint with the Human Rights Bureau of the Employment Relations Division of the Montana Department of Labor & Industry. The Bureau dismissed the complaint because it had not been timely filed. The Human Rights Commission (the "HRC") upheld the dismissal, as did the district court, citing two opinions by this Court that are directly on point. Ms. Zolnikov asks the Court to "overrule" those opinions, but there is no basis for doing so. Instead, the Court should apply those opinions and affirm the lower court.

STATEMENT OF THE ISSUES PRESENTED

Whether the district court correctly held that Ms. Zolnikov's agency complaint was not timely filed, where the Montana Human Rights Act states that any complaint of discrimination "must be filed with the department within 180 days after the alleged unlawful discriminatory practice occurred or was discovered," § 49-2-501(4)(a), MCA, and it is undisputed that Ms. Zolnikov filed her complaint more than 180 days after she was notified in writing that her request for testing accommodations was denied.

STATEMENT OF THE CASE

Ms. Zolnikov filed a Complaint of Discrimination against Respondent-Appellee National Board of Medical Examiners ("NBME") on June 12, 2019 (the

"Agency Complaint"). (Dkt. 4, HRB File). She alleged in her complaint that the date of the "most recent" discrimination was "December 12, 2018." (*Id.* at 1).

Following an informal investigation, the Human Rights Bureau concluded that her complaint was untimely under § 49-2-501(4)(a), MCA, and it dismissed the complaint with a finding of no reasonable cause under § 49-2-501(5), MCA. (*See* Dkt. 4, HRB File, Final Investigative Report (Dec. 4, 2019) ("Report"), and Dkt. 4, HRB File, Notice of Dismissal (Dec. 6, 2019)). It based its dismissal on the statute's unambiguous language as applied to the undisputed facts, and this Court's decision in *Hash v. U.S. W. Commc'ns Servs*, 268 Mont. 326, 886 P.2d 442 (1994). Ms. Zolnikov filed a timely objection to the Bureau's decision, asking the HRC to disregard *Hash* because "[n]owhere in *Hash* does the Court undertake the analysis necessary to understand the statute." (Dkt. 4, HRB File, Objection to Human Right Bureau's Dismissal of Complaint at 6 (Dec. 19, 2019)). The HRC overruled the objection and affirmed the Bureau's dismissal of Ms. Zolnikov's complaint. (Dkt. 4, HRB File, Final Agency Action (March 26, 2020)).

Ms. Zolnikov petitioned for judicial review of the Bureau's decision. (Dkt. 1, Petition for Review of Human Rights Bureau Decision (April 27, 2020)).[1]

[1] Because the case below was initiated by way of a Petition for Review, with Ms. Zolnikov as "Petitioner" and appellee National Board of Medical Examiners as "Respondent," NBME uses those designations here, rather than the "Plaintiff" and "Defendant" designations used in Appellant's Opening Brief.

Citing this Court's decisions in *Hash*, *supra*, and *Skites v. Blue Cross Blue Shield of Montana*, 1999 MT 301, 297 Mont. 156, 991 P.2d 955, the district court affirmed the agency's finding that Ms. Zolnikov's "complaint was untimely" and dismissed her Petition for Review. (Dkt. 15, Order Affirming Final Agency Decision and Order of Dismissal at 2-4 (Aug. 4, 2022); (Appellant's Appendix)).

STATEMENT OF THE FACTS

According to her Petition for Review, Ms. Zolnikov is (or was) a medical student at the University of Washington School of Medicine, and she was required by her medical school to take and pass the United States Medical Licensing Examination ("USMLE"). (Dkt. 1, Petition ¶¶ 5-6). The USMLE is a three-step exam that is administered by NBME, a non-profit entity based in Pennsylvania. (*Id*., ¶ 6).

Ms. Zolnikov took Step 1 of the USMLE in June 2018 "without an accommodation and failed by 1 point." (Appellant's Br. p. 3). She registered to retest and this time she requested 50% more testing time than other examinees receive, based upon an assertion that she has a Generalized Anxiety Disorder and a

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On December 3, 2020 -- several months after filing her Petition for Review but before the lower court ruled on NBME's motion to dismiss the Petition -- Ms. Zolnikov filed a second lawsuit in the district court, asserting two federal claims against NBME relating to its denial of her requests for extra testing time on the USMLE. *See* Complaint and Jury Demand, *Zolnikov v. Nat'l Bd. of Medical Exam'rs*, Cause No. DV-20-100. NBME removed that case to federal court and filed a motion to dismiss, which remains pending.

post-traumatic stress disorder. (Dkt. 1, Petition ¶¶ 8, 9). "This request was denied by NBME on November 19, 2018." (Appellant's Br. p. 3). She appealed, and her appeal was denied by NBME on December 12, 2018. (*Id*.). She tested on December 14, 2018, without accommodations (*i.e*., under the same standardized testing conditions that apply to other examinees), and she passed. (*Id*.).

On June 12, 2019, Ms. Zolnikov filed her Complaint of Discrimination with the Human Rights Bureau. (*Id*.). The Complaint was filed 205 days after NBME initially denied her request for accommodations, and 182 days after she was informed that her appeal had been denied. The Bureau investigated her complaint, concluded that it was not filed in a timely manner, and dismissed the complaint on that basis:

> Zolnikov initially discovered she would not be provided with her requested accommodation on November 19, 2018; however, she did not affirmatively discover that she would be denied her request of accommodation until December 12, 2018 when NBME denied her appeal. This date of discovery, provides [the] filing deadline of June 10, 2019. Zolnikov filed her complaint with the Bureau two days later, on June 12, 2019. Therefore, Zolnikov's complaint is untimely.
>
> By statute, the Human Rights Bureau is required to dismiss an untimely complaint on a finding of no reasonable cause. *Mont. Code Ann. § 49-2-501(5).*

(Dkt. 4, HRB File, Report at 2; *see also* Dkt. 4, HRB File, Notice of Dismissal).

STANDARD OF REVIEW

"The Montana Administrative Procedures Act ... provides the standard of judicial review of agency decisions." *KB Enterprises, LLC v. Montana Hum. Rts. Comm'n*, 2019 MT 131, 396 Mont. 134, 136-37, 443 P.3d 498, 501. Under that statute, the court may reverse or modify the agency decision if the administrative findings are:

> (i) in violation of constitutional or statutory provisions;
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> (ii) in excess of the statutory authority of the agency;
>
> (iii) made upon unlawful procedure;
>
> (iv) affected by other error of law;
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> (v) clearly erroneous in view of the reliable, probative, and substantial evidence on the whole record;
>
> (vi) arbitrary or capricious or characterized by abuse of discretion or clearly unwarranted exercise of discretion.

Section 2-4-704(2), MCA. "Under this standard of review, which applies to both the district court's review of the agency decision and this Court's review of the district court's decision, a reviewing court may not substitute its judgment for that of the administrative agency, but instead reviews the entire record to determine if the agency's findings of fact are clearly erroneous and its conclusions of law are correct." *KB Enterprises,* 396 Mont. at 136-37, 443 P.3d at 501 (case citations omitted).

SUMMARY OF THE ARGUMENT

The district court correctly concluded that Ms. Zolnikov's Complaint of Discrimination was not timely filed. The court's ruling did not violate any constitutional or statutory provision; was not made upon an unlawful procedure; was not affected by any other error of law; was not clearly erroneous; and was not arbitrary or capricious or characterized by an abuse of discretion. The Court should therefore affirm the district court.

ARGUMENT

A discrimination complaint "must be filed with the department within 180 days after the alleged unlawful discriminatory practice occurred or was discovered." Section 49-2-501(4)(a), MCA. The alleged discriminatory act in this case was NBME's denial of Ms. Zolnikov's request for testing accommodations (extra testing time). The denial was communicated to her on November 19, 2018. (Dkt. 4, HRB File, Agency Complaint ¶ 12). She appealed the NBME's decision, and her appeal was denied on December 12, 2018. (*Id*., ¶¶ 13, 14). The denial of her request for accommodations was the "alleged unlawful discriminatory practice," which occurred no later than December 12, 2018, when her appeal was denied.[2]

[2] Ms. Zolnikov's claim arguably accrued when NBME initially denied her request for accommodations, in November 2018, rather than when NBME denied her

Ms. Zolnikov's own complaint acknowledged this fact. It identified the date on which the alleged discrimination "took place" as "December 12, 2018." (Dkt. 4, HRB File, Agency Complaint at 1). She does not dispute that December 12, 2018, is also the date on which the alleged discriminatory practice was discovered, because that is when she was notified in writing by NBME that her appeal had been denied. Therefore, Ms. Zolnikov had 180 days from December 12, 2018, to file her discrimination complaint, because that was both the date on which the "alleged discriminatory practice occurred" and the date on which it was "discovered." *See* § 49-2-501(4)(a), MCA. It is undisputed that she did not file her complaint within 180 days of December 12th. The Human Rights Bureau thus acted properly in dismissing her complaint as untimely.

Confronted with these undisputed facts, Ms. Zolnikov argues that the date of the alleged discrimination was not actually December 12, 2018 -- as she had alleged in her Agency Complaint -- but December 14, 2018, when she took the exam on which she had requested accommodations. (Appellant's Br. p. 8) ("She was not discriminated against until the date she took the Step 1 test.")).[3] According to Ms. Zolnikov, the test date is when the discrimination occurred

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appeal (December 12, 2018). Because Ms. Zolnikov's complaint was untimely with either accrual date, the Court does not need to address this issue.

[3] Ms. Zolnikov passed the Step 1 exam when she tested on December 14th without extra testing time or other accommodations. (Dkt. 1, Petition for Review ¶ 15).

because NBME might have changed its mind after denying her appeal and agreed to provide her with her requested accommodations. (*Id*.). She argues that she had 180 days from that date to file her complaint based upon a "plain reading" of § 49-2-501(4)(a)(2), MCA, or, if the statute is deemed to be ambiguous, by "look[ing] to the intent of [the] legislature" and "public policy" considerations. (*Id*. at 10-11).[4]

The agency and district court correctly rejected these arguments. All elements of Ms. Zolnikov's discrimination claim against NBME existed when she received notification on December 12, 2018, that her request for accommodations had been denied by NBME. Ms. Zolnikov's complaint accrued on that date, not on the date she tested without her requested accommodations.

In arguing otherwise, Ms. Zolnikov resorts to a misguided discussion of "the accrual rule." (Appellant's Br. pp. 6-8). Citing § 27-2-102(2), MCA, she asserts that a "claim or cause of action ... accrues when all the elements of a claim or cause exist," that one of the necessary elements of a claim under the Montana

[4] Ms. Zolnikov acknowledges that she was required to file her discrimination complaint "within 180 days after the alleged unlawful discriminatory practice occurred or was discovered," as provided in § 49-2-501(4)(a), MCA. (Appellant's Br. p. 5). Given this acknowledgment, her suggestion that the present case is somehow similar to *Mungas v. Great Falls Clinic, LLP,* 2009 MT 426, 354 Mont. 50, 221 P.3d 1230, is clearly misplaced. (Appellant's Br. p. 6). The parties in *Mungas* disputed (and the court had to resolve) which limitations provision governed the plaintiffs' claim. *See Mungas*, 354 Mont. at 56-59, 221 P.3d at 1236. No such dispute exists here. Ms. Zolnikov concedes that "the relevant statute of limitations is 180 days." (Appellant's Br. p. 5).

Human Rights Act ("MHRA") "is that a party be 'aggrieved by' a discriminatory practice," and that a party is not aggrieved until she has suffered "some sort of injury or damage." (Appellant's Br. pp. 6-7; *see also Id*. at 6 ("[T]he statute of limitations for an MHRA claim does not begin to run until a complaining party is damaged.")). She then argues that she was not aggrieved, damaged, or discriminated against "until the date she took the Step 1 test," because "[a]t any time prior to the test date," NBME could have changed its mind and "provided an accommodation." (*Id.* at 8). The Court should reject this argument for at least three reasons.

First, the lower court's ruling is entirely consistent with the general accrual statute, which states: "*Unless otherwise provided by statute*, the period of limitation begins when the claim or cause of action accrues." § 27-2-102(2), MCA (emphasis added). The MHRA expressly states when the applicable 180-day limitations period begins to run: "[A] complaint under this chapter must be filed with the department within 180 days after the alleged unlawful discriminatory practice occurred or was discovered." § 49-2-501(4)(a), MCA. Thus, per the MHRA, the 180 days begins to run when the alleged "discriminatory practice occurred or was discovered." There is no reference to a party suing within 180 days of being "damaged" or suffering an "injury." (Appellant's Br. pp. 6-7). Ms.

Zolnikov omits the italicized language when discussing § 27-2-102(2), MCA. (*Id*. at 6-7).[5]

Second, this Court has already rejected the argument now being made by Ms. Zolnikov, in *Hash*, The complainant in that case was notified on June 19, 1991, that "her position would be eliminated," but the elimination did not occur until January 31, 1992. *See* 268 Mont. at 328, 886 P.2d at 444. Just as Ms. Zolnikov argues here that NBME "could have rectified its error" after denying her appeal by changing its mind and "provid[ing] her an accommodation," Appellant's Br. 8, the complainant in *Hash* argued that "she hoped and believed, up to the time of termination that she would be given another ... position," making the date of her termination the discriminatory act that triggered the limitation period. 268 Mont. at 329, 886 P.2d at 444. The Court disagreed: "If there was a discriminatory act in this case, it occurred when U.S. West notified Hash of its decision to eliminate her

[5] The general accrual statute does not rescue Ms. Zolinkov's claim in any event. It provides that "a claim or cause of action accrues when all elements of the claim or cause exist or have occurred, the right to maintain an action on the claim or cause is complete, and a court or other agency is authorized to accept jurisdiction of the action." Section 27-2-102(1)(a), MCA. The alleged discrimination here was NBME's denial of Ms. Zolnikov's request for testing accommodations. All elements of that discrimination claim existed when NBME denied her request for accommodations.

position.... Hash's hopes and beliefs cannot contradict the fact that she discovered the alleged discriminatory act(s) on June 19, 1991." *Id.* [6]

Recognizing that *Hash* defeats her argument, Ms. Zolnikov asserts that the Court "wrongly interpret[ed] the MHRA" in *Hash* and urges the Court to "overrule *Hash*" and instead adopt the reasoning that the U.S. Supreme Court purportedly applied when interpreting Title VII of the federal Civil Rights Act. (*See* Appellant's Br. pp. 5, 7-8, *citing Green v. Brennan*, 578 U.S. 547 (2016)). She says that the district court erred because it "failed to consider *Green,*" Appellant's Br. p. 8, but that was not error. The district court applied directly applicable precedent from *this* Court, interpreting the same Montana statute that is appliable

[6] The Court's analysis was consistent with the holdings of courts in other cases involving the denial of a request for accommodations. *See, e.g.*, *Sexton v. Otis College of Art & Design Bd. of Directors*, 129 F.3d 127 (9th Cir. 1997) (holding that a hearing-impaired student's failure-to-accommodate claim under the Americans with Disabilities Act ("ADA") was untimely where he was notified that the school had denied his request for academic accommodations (a sign-language interpreter) more than two years prior to the filing of his lawsuit, and rejecting plaintiff's argument that his claim was timely because the school "failed to provide an adequate interpreter from January 1991 through January 1995"); *Cairone v. McHenry County College*, 2019 WL 3766112, *8 (N.D. Ill. 2019) ("A failure to accommodate claim accrues when the accommodation is denied.") (dismissing ADA claim as untimely where it was filed more than two years after defendant denied plaintiff's request for accommodations, and rejecting plaintiff's argument that the possibility that defendant would change its mind and grant accommodations as part of the "interactive process" extended the accrual of the limitations period to a later date); *Fado v. Kimber Mfg., Inc*., 2016 WL 3912852, *3 (D.N.J. 2016) ("A failure to accommodate claim accrues when the plaintiff makes a request for accommodation and that request is denied.").

here, and had no need to discuss much less apply a decision by the U.S. Supreme Court interpreting a different, federal statute that is not at issue here.

Third, Ms. Zolnikov's own discrimination complaint asserted that NBME's discriminatory act "took place" on "December 12, 2018," Dkt. 4, Agency Complaint at 1 -- not, as she now argues, "December 14, 2018," Appellant's Br. p. 8. In a directly analogous case, this Court held that a complainant was bound by the statements in her administrative complaint regarding when the alleged discrimination took place, and that those statements confirmed that her complaint had not been timely filed:

> In essence, Skites [(the complainant)] contends that she should have worded—and meant to word—her MHRC complaint to state a later, unspecified date for the "date the most recent or continuing discrimination took place" and that the District Court should have interpreted her MHRC allegation in that fashion.
>
> There are several problems with Skites' contention. First, Skites posits in this part of her argument that the alleged discrimination began on April 15, 1996. This is clearly inconsistent with the other time-based allegation in her MHRC complaint, which was that Blue Cross first failed to accommodate her disability on January 2, 1996.
>
> More importantly, however, to accept Skites' approach would be to prevent the MHRC from having the ability to determine, from the face of an MHRC complaint, whether the complaint was timely filed under § 49–2–501(2)(a), MCA (1995), and, correspondingly, whether it had jurisdiction to consider the complaint. Similarly, the absence of a date certain in the MHRC complaint would prevent district courts from being able to determine whether an MHRC complaint was timely filed and, therefore, whether the *Hash* prerequisite to filing a discrimination complaint in district court—namely, the timely filing of an MHRC complaint—had been met. We reject the notion that a date not set forth

> in an MHRC complaint—whatever the complainant's intent may have been—can create a genuine issue of material fact precluding summary judgment based on the statutory 180–day period of limitation for filing an MHRC complaint.

Skites v. Blue Cross Blue Shield of Montana, 1999 MT 301, 297 Mont. 156, 159-60, 991 P.2d 955, 957-58 (affirming summary judgment in favor of respondent, based upon the complainant's failure to timely file her complaint with the MHRC).

The lower court correctly applied *Hash* and *Skites* in affirming the agency's dismissal of Ms. Zolnikov's untimely discrimination complaint. Ms. Zolnikov makes a passing suggestion that those opinions are "inapplicable to this matter," but she does not say why. (Appellant's Br. p. 5). She then shifts tack, asserting that both opinions "wrongly interpret the MHRA" and that the Court should correct its "error" and "overrule *Hash* and *Skites*." (*Id*.).

Ms. Zolnikov is wrong. Neither *Hash* nor *Skites* "contradicts the plain language of the MHRA," (Appellant's Br. p. 9), and neither should be overruled.

Although arguing that the Court ignored the plain meaning of the statute in deciding *Hash*, Ms. Zolnikov says that § 49-2-501(4)(a), MCA, "does not make [it] clear" whether "the 'or'" in that section "means the 'earlier of' or 'either' the date of discrimination or the date the discrimination was discovered." (Appellant's Br. p. 10). She argues that the Court should adopt her construction by reading the word "either" into the statute, such that "a complaining party must file their

[complaint] 'either' within 180 days of the date of discrimination or the date it was discovered -- not the earlier of the two dates." (*Id.* at 10-11).

The initial problem with this statutory construction argument is that it would not lead to a reversal of the decision below even if accepted. Ms. Zolnikov did not file her complaint within 180 days of "either" the date of the alleged discrimination (*i.e.*, the denial of her accommodation request), or the date she discovered that alleged discrimination (*i.e.*, the date she was informed that her request had been denied). Both occurred on the same date, December 12, 2018, so her complaint was untimely no matter which event one considers.

More importantly, Ms. Zolnikov's construction of the statute, and her related references to the "intent of the legislature" and "public policy," cannot override this Court's construction of the MHRA in *Hash* and *Skites*. And that construction was correct. The intent of the legislature is reflected in the unambiguous words of § 49-2-501(4)(a), MCA: if you want to file a discrimination complaint with the Human Rights Bureau, you must do so "within 180 days after the alleged unlawful discriminatory practice occurred or was discovered." This deadline reasonably balances two public policy goals. It provides an administrative avenue for pursuing claims of discrimination, while ensuring that such claims are asserted in a timely manner. The latter goal is no less important than the first. As this Court noted in applying another of the MHRA's deadlines, the deadlines "are designed to

bring about prompt resolution of discrimination claims." *BNSF Ry. Co. v. Cringle*, 365 Mont. 304, 311, 281 P.3d 203, 208 (2012).

Indeed, Ms. Zolnikov's argument that she had no cause of action until she took the Step 1 exam is not in the best interest of either the parties who assert that a discriminatory denial of accommodations occurred or the parties who defend against such an accusation. If Ms. Zolnikov's position were accepted, an unequivocal denial of accommodations would not be sufficient to state a claim for discrimination or to invoke the Bureau's jurisdiction, because no discrimination could have occurred at that point; the discriminatory conduct would not occur until later, when the impact of the alleged discrimination was felt. That would not be in the interest of complaining parties, as they could not file a complaint despite being told, unequivocally, that their request for accommodations was denied. They could not file a complaint with the Human Rights Bureau or a court unless and until they took the applicable exam with no accommodations.

Nor would it be in the interest of the parties who are accused of discrimination. The 180-day limitations period would become open-ended, thereby making it no limitations period at all. In the testing context, a person denied accommodations could wait months or years to test after being told that accommodations had been denied, thereby stretching out the 180-day limitations for an indeterminate period of time.

In short, *Hash* and *Skites* were correctly decided.

CONCLUSION

The Human Rights Bureau and the HRC properly applied § 49-2-501(4)(a), MCA, to the undisputed facts of this case, in a manner consistent with this Court's holdings in *Hash* and *Skites.* The lower court, in turn, correctly upheld the agency's ruling and dismissed Ms. Zolnikov's Petition for Review. This Court should affirm.

DATED this 2nd day of December 2022.

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CERTIFICATE OF COMPLIANCE

Pursuant to Rule 11 of the Montana Rules of Appellate Procedure, I certify that this brief is printed with proportionately spaced Times New Roman text typeface of 14 points; is double-spaced except for footnotes and quoted, and indented material; and the word count calculated in Microsoft Word is 3,872 words excluding the Table of Contents, Table of Authorities, Certificate of Compliance and Certificate of Service.

DATED this 2nd day of December, 2022.

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served on the following recipient on this 2nd day of December 2022 by placing a true and correct copy of same in the U.S. mail, postage prepaid, for delivery to:

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I, Mark D. Parker, hereby certify that I have served true and accurate copies of the foregoing Brief - Appellee's Response to the following on 12-02-2022:

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