

CLOSED

**U.S. District Court
District of Delaware (Wilmington)
CIVIL DOCKET FOR CASE #: 1:05-cv-00348-JJF**

Equal Employment Opportunity Commission v.
Citibank/Citigroup Global Markets, Inc.
Assigned to: Honorable Joseph J. Farnan, Jr.
Cause: 42:12101 Americans with Disabilities Act

Date Filed: 05/31/2005
Date Terminated: 09/28/2006
Jury Demand: Plaintiff
Nature of Suit: 442 Civil Rights: Jobs
Jurisdiction: U.S. Government Plaintiff

Plaintiff

**Equal Employment Opportunity
Commission**

represented by **Cynthia A. Locke**
U.S. Equal Employment Opportunity
Commission
21 South 5th Street
Suite 400
Philadelphia, PA 19106
Email: cynthia.locke@eeoc.gov
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

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TERMINATED: 04/26/2006
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V.

Defendant**Citibank Delaware**represented by **David H. Williams**

Morris James LLP

500 Delaware Avenue, Suite 1500

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Wilmington, DE 19899-2306

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ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
05/31/2005	<u>1</u>	COMPLAINT filed with Jury Demand against Citibank/Citigroup Global Markets, Inc. - Magistrate Consent Notice to Pltf. - filed by Equal Employment Opportunity Commission. (Attachments: # <u>1</u> Civil Cover Sheet # <u>2</u> Acknowledgement of Consent Form)(els,) (Entered: 06/01/2005)
05/31/2005		Summons Issued as to Citibank/Citigroup Global Markets, Inc. on 5/31/2005. (els,) (Entered: 06/01/2005)
06/08/2005		Case assigned to Judge Joseph J. Farnan, Jr. Please include the initials of the Judge (JJF) after the case number on all documents filed. (rjb,) (Entered: 06/08/2005)
06/23/2005	<u>2</u>	Return of Service Executed by Equal Employment Opportunity Commission. Citibank/Citigroup Global Markets, Inc. served on 6/10/2005, answer due 6/30/2005. (afb,) (Entered: 06/27/2005)
07/01/2005		CORRECTING ENTRY: edit cause code (els,) (Entered: 07/01/2005)
07/06/2005	<u>3</u>	STIPULATION TO EXTEND TIME for Defendant to respond to Complaint to July 15, 2005 - filed by Equal Employment Opportunity Commission, Citibank/Citigroup Global Markets Inc.. (Williams, David) (Entered: 07/06/2005)
07/07/2005	<u>4</u>	MOTION for Pro Hac Vice Appearance of Attorney Sarah E. Pontoski - filed by Citibank/Citigroup Global Markets Inc.. (Williams, David) (Entered: 07/07/2005)
07/07/2005	<u>5</u>	MOTION for Pro Hac Vice Appearance of Attorney Judith E. Harris - filed by Citibank/Citigroup Global Markets Inc.. (Williams, David) (Entered: 07/07/2005)
07/07/2005		SO ORDERED, re <u>3</u> STIPULATION TO EXTEND TIME for Defendant to respond to Complaint to July 15, 2005 filed by Equal Employment Opportunity Commission, Citibank/Citigroup Global Markets Inc. Signed by Judge Joseph J. Farnan, Jr. on 07/07/05. (afb,) (Entered: 07/08/2005)
07/07/2005		Reset Answer Deadlines: Citibank/Citigroup Global Markets Inc. answer due 7/15/2005 per D.I. 3. (afb,) (Entered: 07/08/2005)
07/08/2005	<u>6</u>	MOTION Admission Pro Hac Vice: Cynthia Locke - filed by Equal Employment Opportunity Commission. (Contreras, Rudolph) (Entered: 07/08/2005)

07/11/2005		SO ORDERED, re 5 MOTION for Pro Hac Vice Appearance of Attorney Judith E. Harris filed by Citibank/Citigroup Global Markets Inc . Signed by Judge Joseph J. Farnan, Jr. on 07/11/05. (afb,) (Entered: 07/12/2005)
07/11/2005		SO ORDERED, re 4 MOTION for Pro Hac Vice Appearance of Attorney Sarah E. Pontoski filed by Citibank/Citigroup Global Markets Inc. Signed by Judge Joseph J. Farnan, Jr. on 07/11/05. (afb,) (Entered: 07/12/2005)
07/11/2005		SO ORDERED, re 6 MOTION Admission Pro Hac Vice: Cynthia Locke filed by Equal Employment Opportunity Commission . Signed by Judge Joseph J. Farnan, Jr. on 07/08/05. (afb,) (Entered: 07/12/2005)
07/15/2005	7	MOTION to Allow EEOC Attorney to Appear Without Local Counsel - filed by Equal Employment Opportunity Commission. (Contreras, Rudolph) (Entered: 07/15/2005)
07/15/2005	8	ANSWER to Complaint by Citibank/Citigroup Global Markets Inc..(Williams, David) (Entered: 07/15/2005)
07/20/2005	10	DEFICIENCY NOTICE by the Court issued to David H. Williams, Esq. re 8 Answer to Complaint. Courtesty copy needed. (afb,) (Entered: 07/27/2005)
07/22/2005	9	ORDER granting 7 Motion to Allow EEOC Attorney, Cynthia A. Locke, to appear without local cnsl. Signed by Judge Joseph J. Farnan, Jr. on 07/22/05. (afb,) (Entered: 07/25/2005)
09/27/2005	11	PROPOSED ORDER Rule 16 Scheduling Order by Citibank/Citigroup Global Markets Inc.. (Williams, David) (Entered: 09/27/2005)
10/05/2005	12	NOTICE OF SERVICE of Defendant's Initial Disclosures by Citibank/Citigroup Global Markets Inc..(Williams, David) (Entered: 10/05/2005)
10/05/2005	13	RULE 16 SCHEDULING ORDER: Pre-Discovery Disclosures ddl. 10/05/05. Joinder of Parties due by 11/15/2005. Amended Pleadings due by 11/15/2005. Discovery due by 11/30/2005. Dispositive Motions due by 6/15/2006. Signed by Judge Joseph J. Farnan, Jr. on 10/05/05. (afb,) (Entered: 10/06/2005)
10/05/2005	14	ORDER that a Pretrial Conference is set for 8/10/2006 at 10:00 AM in Courtroom 4B before Honorable Joseph J. Farnan, Jr.; Trial will be scheduled at the Pretrial Cnf. to commence within 120 days of the pretrial cnf. Cnsl. should be available during the 120 day period for trial. Signed by Judge Joseph J. Farnan, Jr. on 10/05/05. (afb,) (Entered: 10/06/2005)
10/21/2005	15	NOTICE OF SERVICE of Defendant's First Set of Interrogatories and Defendant's First Set of Requests for Production by Citibank/Citigroup Global Markets Inc..(Williams, David) (Entered: 10/21/2005)
10/24/2005	16	ORDER that a Pretrial Conference set for 8/3/2006 at 10:00 AM in Courtroom 4B before Honorable Joseph J. Farnan, Jr.; Signed by Judge Joseph J. Farnan, Jr. on 10/24/05. (afb,) (Entered: 10/25/2005)
11/15/2005	17	STIPULATION Extend dates in Scheduling Order by Equal Employment Opportunity Commission. (Locke, Cynthia) (Entered: 11/15/2005)
11/17/2005		SO ORDERED, re 17 Stipulation filed by Equal Employment Opportunity Commission that the Rule 16 Scheduling Order of October 4, 2005, for joinder of

		parties and amendment of pleadings be extended from 11/15/05 to 12/02/05. Signed by Judge Joseph J. Farnan, Jr. on 11/17/05. (afb,) Modified on 11/18/2005 (afb,). (Entered: 11/17/2005)
11/17/2005		Reset Scheduling Order Deadlines: Amended Pleadings due by 12/2/2005. Joinder of Parties due by 12/2/2005 per D.I. 17. (afb,) (Entered: 11/17/2005)
11/18/2005	18	Letter to The Court from Chynthia A. Locke, Esq., dated 11/15/05 - re 17 Stipulation. (afb,) (Entered: 11/18/2005)
12/02/2005	19	STIPULATION To Amend Complaint and Change Named Defendant by Equal Employment Opportunity Commission. (Attachments: # (1))(Locke, Cynthia) (Entered: 12/02/2005)
12/02/2005	20	AMENDED COMPLAINT <i>Changing Name of Defendant to Citibank Delaware</i> against Citibank/Citigroup Global Markets Inc.- filed by Equal Employment Opportunity Commission.(Locke, Cynthia) (Entered: 12/02/2005)
12/08/2005		CORRECTING ENTRY: Clerk removed attachment to Stipulation (D.I. 19). Attachment was docketed as an Amended Complaint (D.I. 20). (afb,) (Entered: 12/08/2005)
12/08/2005		SO ORDERED, re 19 Stipulation to change the name of the Defendant in this action from "Citibank/ Citigroup Global Markets, Inc." to "Citibank Delaware." filed by Equal Employment Opportunity Commission . Signed by Judge Joseph J. Farnan, Jr. on 12/08/05. (afb,) (Entered: 12/12/2005)
12/08/2005		CORRECTING ENTRY: Clerk updated deft. "Citibank/ Citigroup Global Markets, Inc." to "Citibank Delaware" per D.I. 19. (afb,) (Entered: 12/13/2005)
12/13/2005	21	ANSWER to Amended Complaint <i>and Separate Defenses</i> by Citibank Delaware.(Williams, David) (Entered: 12/13/2005)
12/20/2005	22	NOTICE to Take Deposition of Theresa B. Jenkins on January 20, 2006 by Citibank Delaware.(Williams, David) (Entered: 12/20/2005)
01/05/2006	23	NOTICE to Take Deposition of Terry B. Jenkins on January 20, 2006 by Citibank Delaware.(Williams, David) (Entered: 01/05/2006)
01/18/2006	24	NOTICE OF SERVICE of Defendant's Responses to Plaintiff EEOC's First Request for Production of Documents to Defendant Citibank Delaware and Defendant Citibank Delaware's Objections and Resposnes to Plaintiff EEOC's First Set of Interrogatories by Citibank Delaware.(Williams, David) (Entered: 01/18/2006)
01/31/2006	25	NOTICE to Take Deposition of Terry B. Jenkins on February 9, 2006 by Citibank Delaware.(Williams, David) (Entered: 01/31/2006)
04/10/2006	26	STIPULATION To Extend Discovery Dates in the Court's Scheduling Order by Equal Employment Opportunity Commission. (Locke, Cynthia) (Entered: 04/10/2006)
04/13/2006		SO ORDERED, re 26 Stipulation that deadlines in the Court's Rule 16 Scheduling Order dated 10/05/05 be extended for thirty days. Pltf.'s expert reports ddl. 05/15/06; Deft.'s expert reports ddl. 06/14/06; Dispositive Motions ddl. 07/14/06. Signed by Judge Joseph J. Farnan, Jr. on 04/13/06. (afb,)

		(Entered: 04/13/2006)
04/13/2006	27	ORDER that a Pretrial Conference is set for 10/5/2006 at 02:30 PM in Courtroom 4B before Honorable Joseph J. Farnan, Jr.; Signed by Judge Joseph J. Farnan, Jr. on 04/13/06. (afb,) (Entered: 04/13/2006)
04/26/2006	28	NOTICE OF SUBSTITUTION OF COUNSEL re Equal Employment Opportunity Commission: Entry of appearance of attorney Douglas Edward McCann. Attorney Rudolph Contreras terminated. (McCann, Douglas) (Entered: 04/26/2006)
05/30/2006	29	NOTICE to Take Deposition of J.G. Scudder on June 9, 2006 by Citibank Delaware.(Williams, David) (Entered: 05/30/2006)
05/31/2006	30	Joint STIPULATION to amend answer to amended complaint re 21 Answer to Amended Complaint by Citibank Delaware. (Williams, David) (Entered: 05/31/2006)
05/31/2006	31	AMENDED ANSWER to 20 Amended Complaint by Citibank Delaware. (Williams, David) (Entered: 05/31/2006)
06/02/2006		SO ORDERED, re 30 Joint Stipulation To Amend Answer To Amended Complaint that Deft. Citibank Delaware may amend its Answer to the Amended Complaint to reflect its position that MetLife is not its insurance carrier. Citibank Delaware files an Amended Answer to the Amended Complaint and Separate Defenses with references to MetLife changed to reflect its position that MetLife is not Citibank Delaware's insurance carrier . Signed by Judge Joseph J. Farnan, Jr. on 06/02/06. (afb,) (Entered: 06/05/2006)
06/08/2006	32	NOTICE to Take Deposition of J.G. Scudder on June 23, 2006 by Citibank Delaware.(Williams, David) (Entered: 06/08/2006)
06/08/2006	33	STIPULATION To Extend Deadlines in Scheduling Order by Equal Employment Opportunity Commission. (Locke, Cynthia) (Entered: 06/08/2006)
06/13/2006		SO ORDERED 33 Stipulation that Pretrial Conference is reset for 11/9/2006 at 10:00 AM in Courtroom 4B before Honorable Joseph J. Farnan, Jr.; Dispositive Motions extended to 8/14/2006. Signed by Judge Joseph J. Farnan, Jr. on 06/13/06. (afb,) (Entered: 06/13/2006)
07/17/2006	34	MOTION to Compel <i>Discovery Responses</i> - filed by Equal Employment Opportunity Commission. (Attachments: # 1 Proposed Order # 27.1.1 Statement)(Locke, Cynthia) Modified on 7/18/2006 (dab,). (Entered: 07/17/2006)
07/17/2006	35	OPENING BRIEF in Support re 34 MOTION to Compel <i>Discovery Responses</i> filed by Equal Employment Opportunity Commission.Answering Brief/Response due date per Local Rules is 7/31/2006. (Attachments: # 1 Certificate of Service)(Locke, Cynthia) Modified on 7/18/2006 (dab,). (Entered: 07/17/2006)
07/31/2006	36	Joint STIPULATION to extend deadlines in scheduling order by Citibank Delaware. (Williams, David) (Entered: 07/31/2006)
07/31/2006	37	Letter to The Honorable Joseph J. Farnan, Jr. from David H. Williams regarding filing of responsive pleading to Plaintiff's Motion to Compel - re 34 MOTION to

		Compel <i>Discovery Responses</i> , 35 Opening Brief in Support,. (Williams, David) (Entered: 07/31/2006)
08/03/2006	38	RESPONSE to Motion re 34 MOTION to Compel <i>Discovery Responses</i> filed by Citibank Delaware. (Williams, David) (Entered: 08/03/2006)
08/03/2006	39	ANSWERING BRIEF in Opposition re 34 MOTION to Compel <i>Discovery Responses</i> filed by Citibank Delaware.Reply Brief due date per Local Rules is 8/10/2006. (Attachments: # 1 Exhibit Exhibits A and B# 2 Exhibit Exhibit C# 3 Exhibit Exhibit D through G# 4 Exhibit Exhibit H# 5 Exhibit Exhibits I and J# 6 Exhibit Exhibits K through N)(Williams, David) (Entered: 08/03/2006)
08/11/2006	40	Letter to The Honorable Joseph J. Farnan, Jr. from James H. McMackin, III regarding stipulation to extend deadlines for filing dispositive motions. (Attachments: # 1 Joint Stipulation to Extend Deadlines in Scheduling Order)(McMackin, James) (Entered: 08/11/2006)
09/26/2006	41	SETTLEMENT AGREEMENT <i>CONSENT DECREE AND NOTICE</i> by Equal Employment Opportunity Commission. (Locke, Cynthia) (Entered: 09/26/2006)
09/28/2006		SO ORDERED re 41 Settlement Agreement (Consent Decree) filed by Equal Employment Opportunity Commission, . Signed by Judge Joseph J. Farnan, Jr. on 9/28/06. (dab,) (Entered: 09/28/2006)
09/28/2006		CASE CLOSED (dab,) (Entered: 09/28/2006)

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