

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

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CLERK
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF IL
EAST ST. LOUIS OFFICE

CLAUDINE WILFONG, et al.,

Plaintiffs,

and

EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,

Plaintiff-Intervenor,

v.

RENT-A-CENTER, INC.,

Defendant.

Cause No. 00-680-DRH

**JOINT MOTION FOR PRELIMINARY APPROVAL OF STIPULATION OF
SETTLEMENT, PROPOSED CONSENT DECREE, AND OF FORM,
ADEQUACY, AND MANNER OF NOTICE TO SETTLEMENT CLASS,
AND TO SET HEARING ON PROPOSED SETTLEMENT**

COME NOW Plaintiffs, Plaintiff-Intervenor, and Defendant, and jointly move this Court for an Order Preliminary Approving Their Stipulation of Settlement, and of Form, Adequacy, and Manner of Notice to Settlement Class, state as follows:

1. Plaintiffs, Plaintiff-Intervenor, and Defendant have entered into a Stipulation and Settlement Agreement ("Settlement Agreement") dated June 10, 2002.

2. Plaintiffs, Plaintiff-Intervenor, Defendant, and their respective counsel believe that the Settlement which is the subject of the aforesaid Stipulation of Settlement and Consent Decree is fair, adequate and reasonable in light of the risks of litigation, the stage of the proceedings, and the expense, likely duration and complexity of the action.

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3. The Settlement is the result of good faith and arms-length bargaining between the Plaintiffs, Plaintiff-Intervenor, and Defendant and was not reached through collusion.

4. The Class concerning which the parties have continuously negotiated is defined as follows:

All women who have been employed by Rent-A-Center, Inc., Thorn Americas, Inc., or Renters Choice, Inc. ("RAC Companies") at any time between April 19, 1998 and the date of the entry of the Order preliminary approving this Settlement, as well as any women who have made application for employment or have been deterred from making application for employment with any of those corporate entities during the same period, and who have been or are being or may in the future be adversely affected by the continuing policy of discrimination with regard to hiring, promotion, demotion, termination, hostile work environment, and terms and condition of employment because of their sex.

5. Adequate notice of the pendency of this action, the Stipulation of Settlement, the Class, the right of putative Class Members to exclude themselves, the right of Class Members to object to the Settlement, and the hearing on objections will be attempted by mail by the Settlement Administrator to each Class Member who can reasonably be located, and as described in subparagraph (7)(b) below.

6. The Notice, in the forms attached to the Stipulation of Settlement, adequately and clearly informs absent Class Members of the terms of the Settlement, their right to inspect documents on file at the Court, their right to object to the Settlement, their right to request exclusion from the Settlement, and the time and location of the hearing on final approval.

7. Accordingly, Plaintiffs, Plaintiff-Intervenor, and Defendant request the Court's Order, to wit:

(a) Appointing Settlement Services, Inc. as Settlement Administrator empowered to provide for or assist in the issuance of Notice to Class Members and otherwise administer the Settlement;

(b) Providing that reasonable efforts shall be undertaken to notify known Class Members of this Settlement by publication and/or that the Settlement Administrator mail by First Class U.S. Mail a copy of a Notice, in a form substantially similar to that shown as Exhibit 2 to the Stipulation of Settlement, that the Settlement Administrator attempt to mail such Notice to all female applicants, employees and former female employees within the class period included in the class definition whom Defendant can and does identify from its records, and that said Notices be mailed within twenty-one (21) days after entry of the Order preliminarily approving the Settlement, in envelopes bearing the return address: "Settlement Administrators, Inc., 2032-D Thomasville Road, Tallahassee, Florida 32308," and stating "PLEASE FORWARD;"

(c) Providing that Class Counsel or the Settlement Administrator use best efforts to cause the Summary Notices, in the form attached as Exhibit 3 to the Stipulation of Settlement, to be published in the following periodicals: The National Enquirer _____, within twenty-one (21) days of the entry of the Order preliminarily approving the Settlement, and further, providing that, on or before July 10, 2002, Class Counsel or the Settlement Administrator shall file with the Court an Affidavit that Notice has been effectuated;

(d) Finding that the mailing and publication of Notices as provided in subparagraphs (b) and (c), above, constitute the best notice practical under the circumstances to

the Settlement Class and that such Notices comport with due process and are due and sufficient notice for all purposes to all persons entitled thereto;

(e) Requiring that the Settlement Administrator rent a post office box for the return of undeliverable Notices, request for exclusion forms, requests for review of duration of employment, and written objections and providing that Class Counsel or the Settlement Administrator shall furnish to the Court and Counsel for Defendant copies of: (i) in the case of Notices and any other communications to Class Members, a prototype of the form of such Notice together with a list of names and addresses to whom such Notice or communication has been sent by mail, and (ii) in the case of Requests for Exclusion, requests for review of duration of employment, and Objections to the Settlement, copies of any such documents;

(f) Requiring that all requests for exclusions and objections be received by the Settlement Administrator not later than sixty (60) days after the mailing of notices described in subparagraph 7(b) and that all claim forms must be received by the Settlement Administrator not later than seventy (70) days after notices are sent;

(g) Scheduling a hearing to determine the lawfulness, reasonableness, adequacy, and fairness of the Settlement, and whether the Settlement should be finally approved by this Court, and whether an Order and Judgment granting Final Judicial Approval should be entered thereon;

(h) Providing that any Class Member or any other person or entity with standing to object and who does object to the approval of the Settlement may appear at the aforesaid hearing and show cause why the Settlement should not be approved as fair, reasonable, and adequate;

(i) Requiring that all objections to the Settlement which are to be heard at the hearing on final approval of the Settlement and any papers or briefs submitted in support of said objections, will be considered only if said objectors make all of their objections in writing, file them with the Court and serve on all Counsel of Record for all parties a written statement of their objections and copies of all papers, affidavits, or briefs in support of their objections not later than sixty (60) days after the mailing of the notices described in sub-paragraph 7(b). Any objectors who wish to appear at the hearing on final approval of the Settlement must file written notice of their intention to appear contemporaneously with the filing of their objections; and

(j) Authorizing Class Counsel to respond to inquiries from Class members at Class Counsel's discretion concerning the Settlement, and the status of the case.

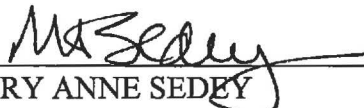
WHEREFORE, Plaintiffs, Plaintiff-Intervenor, and Defendant request that this Court enter an Order containing the provisions set forth above. Plaintiffs, Plaintiff-Intervenor, and Defendant attach a Proposed Order.

Respectfully submitted,

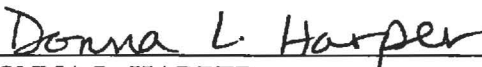
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