

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

FILED BY *[Signature]* D.C.

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Robert J. L. Iorio  
CLERK, U.S. DIST. CT.  
W. D. OF TENN. MEMPHIS

EQUAL EMPLOYMENT OPPORTUNITY )  
COMMISSION, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
LINK-PARAS, LLC, )  
d/b/a COMFORT SUITES and )  
MICROTEL INN & SUITES, )  
 )  
Defendant. )

CIVIL ACTION NO.

03-2641-DA

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CONSENT DECREE

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This lawsuit was filed August 29, 2003 by the Equal Employment Opportunity Commission (EEOC) against Link-Paras, LLC, doing business as Comfort Suites and Microtel Inn & Suites (Link-Paras) under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. Section 2000e, et seq. (Title VII). The Complaint in this lawsuit claims that Link-Paras discriminated against Ashlee Watkins, Tonya Boyd, and Latoya Shaw because of their sex by subjecting them to sexual harassment; and by terminating the employment of Ms. Watkins and Ms. Boyd in retaliation for their complaints about the sexual harassment.

EEOC and Link-Paras have agreed to this consent decree to settle all of the claims involved in this lawsuit.

The Court has reviewed the terms of this decree in light of the applicable laws and regulations, and hereby approves this decree. **THEREFORE**, it is hereby **ORDERED**:

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## **I. JURISDICTION**

The United States District Court for the Western District of Tennessee, Western Division, has jurisdiction over the parties and subject matter of this lawsuit, and will retain jurisdiction over this decree for purposes of enforcement and dispute resolution.

## **II. DISCLAIMER**

Neither the negotiation of or agreement to this decree is an admission or acknowledgment by Link-Paras that any of its employees, officers, directors, or agents have violated Title VII.

## **III. DURATION OF DECREE**

This decree will be binding on the parties to this lawsuit for three years after the date of its entry by the Court.

## **IV. INJUNCTIVE RELIEF**

Link-Paras, its supervisors, managers, officers, directors, agents, and successors are enjoined from sexually harassing employees and from discriminating against employees because they have opposed or complained about employment practices made unlawful by Title VII, or because they have made a charge under Title VII.

## **V. INDIVIDUAL REMEDIES**

Link-Paras will pay a total of \$35,000.00 in monetary damages, as directed by the Commission, to Ashlee Watkins, Tonya Boyd, and Latoya Shaw, within twenty days after the later of, receipt of a copy this decree entered by the Court, and receipt of the payment instructions from EEOC. The payments will be made by mailing checks to the three individuals at the addresses which will be provided by EEOC. Nothing except the checks

will be mailed to the individuals by Link-Paras. A copy of the checks (front and back), will be mailed at the same time to:

Carson L. Owen, Senior Trial Attorney  
Equal Employment Opportunity Commission  
1407 Union Ave., Suite 621  
Memphis, TN 38104.

## **VI. TRAINING**

Within thirty days after receiving a copy of this decree entered by the Court, Link-Paras will provide training for all of its employees concerning the responsibility of all employees not to harass other employees and to report promptly any harassment which occurs.. This training will also address the responsibility of supervisors and managers to deal quickly, effectively, and fairly with any harassment found to have occurred, and not to retaliate against employees for complaining about unlawful harassment or filing charges with EEOC. Within twenty days after the completion of this training, Link-Paras will submit a report to Carson Owen, at the address indicated above, confirming that this training has occurred.

## **VII. POLICY PROHIBITING HARASSMENT**

The policy prohibiting harassment which is attached to this decree will be complied with by Link-Paras. Within thirty days after receiving a copy of this decree entered by the Court, each employee will be required to read and sign a copy of this policy, and will be given a copy of the policy. Within twenty days after this requirement has been complied with, Link-Paras will submit a report to Carson Owen, at the address indicated above, confirming that this requirement has been complied with. Thereafter, whenever a new

employee is hired, he or she will be required to read and sign a copy of this policy, and will be given a copy of the policy.

### **VIII. REPORTING**

Link-Paras will submit a report to Carson L. Owen, at the address indicated above, six months after the entry of this decree, and every six months thereafter during the duration of this decree. Each report will describe all complaints received from employees concerning sexual harassment at work, including the name, home address, and home telephone number of each employee who complained, the nature of the complaint, what action, if any, was taken in response to the complaint, and if no action was taken an explanation of why no action was taken.

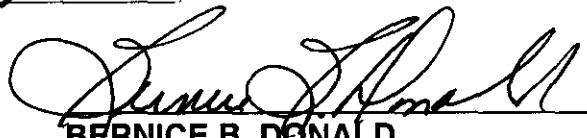
### **IX. POSTING OF NOTICE**

Within ten days after receiving a copy of this decree entered by the Court, Link-Paras will post the notice attached to this decree for thirty days in conspicuous places upon its premises where notices to employees are customarily posted. Within fifty days after receiving a copy of this decree entered by the Court, Link-Paras will send a letter to Carson Owen, at the address indicated above, verifying that this requirement has been complied with.

### **X. ATTORNEY'S FEES AND COSTS**

EEOC and Link-Paras will each bear their own attorney's fees and costs incurred in this lawsuit.

SO ORDERED this 4<sup>th</sup> day of August, 2004.



**BERNICE B. DONALD**  
**UNITED STATES DISTRICT JUDGE**


Consented to on behalf of the respective parties:

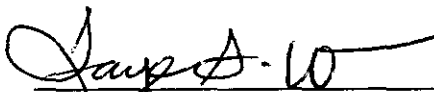
**FOR PLAINTIFF EEOC:**

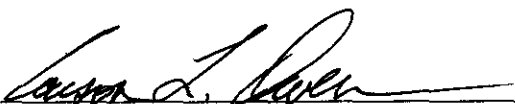
**ERIC S. DREIBAND**  
General Counsel

**JAMES LEE**  
Deputy General Counsel

**GWENDOLYN YOUNG REAMS**  
Associate General Counsel

  
**KATHARINE W. KORES**  
Regional Attorney  
Tennessee Bar No. 006283

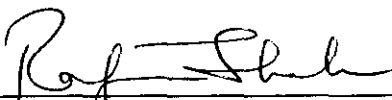
  
**FAYE WILLIAMS**  
Supervisory Trial Attorney  
Tennessee Bar No. 011730

  
**CARSON L. OWEN**  
Senior Trial Attorney  
Tennessee Bar No. 009240


**EQUAL EMPLOYMENT OPPORTUNITY  
COMMISSION**

1407 Union Avenue, Suite 621  
Memphis, Tennessee 38104  
Telephone No. (901) 544-0133

**FOR DEFENDANT:**

  
Ragini Shah, Member-Secretary

**LINK-PARAS, LLC**

  
**CHARLES W. CAVAGNARO, JR.**

**BOWLING & BOWLING**  
7936 Players Forest Drive  
Memphis, TN 38119  
Telephone No. (901) 761-3440


**ATTORNEYS FOR DEFENDANT**

**NOTICE**

This Notice is being posted as part of a settlement agreement between Link-Paras, Inc. and the United States Equal Employment Opportunity Commission (EEOC).

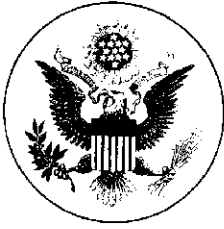
EEOC enforces Title VII of the Civil Rights Act of 1964 (Title VII), which prohibits employment discrimination based on race, color, religion, sex, or national origin; the Age Discrimination in Employment Act; the Equal Pay Act; sections of the Civil Rights Act of 1991; and Title I of the Americans With Disabilities Act, which prohibits discrimination against people with disabilities. Harassment because of national origin is one type of discrimination prohibited by Title VII.

Link-Paras supports these Federal laws in all respects, and will not take any action against employees because they have exercised their rights under the law by complaining about discrimination or by filing a discrimination charge with EEOC.



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Ragini Shah, Member-Secretary  
Link-Paras, Inc.



## Notice of Distribution

This notice confirms a copy of the document docketed as number 14 in case 2:03-CV-02641 was distributed by fax, mail, or direct printing on August 5, 2004 to the parties listed.

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W. Kerby Bowling  
BOWLING & BOWLING  
7936 Players Forest Dr.  
Memphis, TN 38119

Carson L. Owen  
EQUAL EMPLOYMENT OPPORTUNITY COMMISSION  
1407 Union Avenue  
Ste. 621  
Memphis, TN 38104

Michael V. Tichenor  
BOWLING & BOWLING  
7936 Players Forest Dr.  
Memphis, TN 38119

Faye A. Williams  
EQUAL EMPLOYMENT OPPORTUNITY COMMISSION  
1407 Union Avenue  
Ste. 621  
Memphis, TN 38104

Honorable Bernice Donald  
US DISTRICT COURT