UNITED STATES DISTRICT COURT WESTERN DISTRICT OF LOUISIANA

WESTERN DISTRICT OF LOUISIANA

MONROE DIVISION

UNITED STATES OF AMERICA,)
Plaintiff) CIVIL ACTIONNO.: CV01-0116M
) SECTION
VERSUS) JUDGE: HON. JAMES
) MAGISTRATE: HON. KIRK
CITY OF BASTROP, LOUISIANA,)
Defendant)
)

ANSWER

COMES NOW the City of Bastrop, Louisiana ("City"), in Answer to the above-styled and numbered cause, in the following respects to wit:

1.

The allegations contained in Paragraph 1 of the Complaint require no response.

2.

The allegations contained in Paragraph 2 of the Complaint are admitted.

3.

The allegations contained in Paragraph 3 of the Complaint are admitted.

4.

The allegations contained in Paragraph 4 of the Complaint are admitted.

5.

The allegations contained in Paragraph 5 of the Complaint are denied.



6.

The allegations contained in Paragraph 6 of the Complaint are denied for lack of sufficient information to justify belief.

7.

The allegations contained in Paragraph 7 of the Complaint regarding the efforts of the EEOC are admitted, but the remaining allegations are denied for lack of sufficient information to justify belief. The City further responds by showing that as of the date of filing of the instant Answer, the City and Kimberly A. Mullins, through conciliation, have reached a voluntary resolution of financial claims by and between the parties, the City has adopted revised harassment and discrimination policies, and conducted training and in-service sessions with City employees regarding harassment and discrimination in the workplace.

8.

The allegations contained in Paragraph 8 of the Complaint are admitted, insofar as a legal right to sue is concerned, but are denied in all other respects.

WHEREFORE, Defendant, City of Bastrop prays that this Court dismiss the instant Complaint, at plaintiff's cost.

RESPECTFULLY SUBMITTED

L. DOUGLAS LAWRENCE Attorney & Counselor at Law 648 East Jefferson Avenue Bastrop, Louisiana 71220

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BY: L. Douglas Lawrence (18636)

Attorney for Defendant City of Bastrop, Louisiana

CERTIFICATE OF SERVICE

A copy of the foregoing Answers has been served on the plaintiffs by forwarding an exact copy of the same to Hon. John Ashcroft, Attorney General & Hon. Bill Lann Lee, Assistant Attorney General for Civil Rights; U.S. Department of Justice; Constitution Avenue; Washington, D.C. 20530, Mr. William B. Fenton, Esq. & Ms. Jodi Danis, Esq.; U.S. Department of Justice; Civil Rights Division; Employment Litigation Section; Post Office Box 65968; Washington, D.C. 20035-5968, and Hon. William J. Flanagan, United States Attorney & Mr. John A. Broadwell, Chief; Civil Division; Assistant United States Attorney; United States Courthouse; 300 Fannin Street, Suite 3201; Shreveport, Louisiana 71101-3068 via the United States Mail service, by first class mail, and postage prepaid, on this

LAW OFFICES

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ROBERT H. SHEMWELL, CLERK WESTERN DISTRICT OF LOUISIANA SHREVEPORT, LOUISIANA

February 15, 2001

Hon. Robert Shemwell, Clerk United States District Court Western District of Louisiana United States Courthouse 300 Fannin Street, Suite 1167 Shreveport, Louisiana 71101-3083

Hon. John Ashcroft Attorney General of the United States Constitution Avenue Washington, D.C. 20530

Hon. Bill Lann Lee Assistant Attorney General for Civil Rights Office of the United States Attorney General Constitution Avenue Washington, D.C. 20530

> United States of America, et al. Re: -vs- No.: CV01-0116M City of Bastrop, Louisiana, et al.

Lady & Gentlemen:

Please find enclosed a copy of the original Answer filed in the above referenced. Mr. Shemwell's office will be receiving the original Answer.

Hon. Jodi Danis, Esq. U.S. Department of Justice Civil Rights Division **Employment Litigation Section** Post Office Box 65968 Washington, D.C. 20035-5968

Hon. William J. Flanagan United States Attorney 300 Fannin Street, Suite 3201 Shreveport, Louisiana 71101-3068 I would appreciate Mr. Shemwell providing written confirmation to my office of his receipt of the original filing. With kindest regards, I remain,

Very truly yours,

Doug Lawrence

ldl/dm

xc: Mayor Clarence W. Hawkins

Enclosures