

24

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
PEORIA DIVISION

FILED

EQUAL EMPLOYMENT OPPORTUNITY)
COMMISSION,)

Plaintiff,)

v.)

DEB SHOPS, INC. and)
DEB OF ILLINOIS, INC.,)
d/b/a DEB SHOPS, INC.)

Defendants.)

JAN 19 2001

JOHN M. WATERS, Clerk
U.S. DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS

No. 98 C 1321

Judge McDade

MOTION FOR ENTRY OF CONSENT DECREE

Plaintiff U.S. Equal Employment Opportunity Commission (the "EEOC") and Defendants Deb Shops, Inc. and Deb of Illinois, Inc., d/b/a Deb Shops, Inc. (hereinafter collectively referred to as "Deb Shops" or "Defendants"), request that this Court enter the attached Consent Decree in resolution of this action. In support of this Motion, the parties state as follows:

1. The parties have agreed that this action should be finally resolved by entry of the Consent Decree attached hereto.

2. The terms and provisions of the Consent Decree are adequate, fair, reasonable, equitable and just. The rights of the Defendant, the EEOC and the public interest are adequately protected by the Consent Decree.

3. The Consent Decree conforms with the Federal Rules of Civil Procedure and Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §2000e et seq. ("Title VII"), and is not a derogation of the rights and privileges of any person. The entry of the Consent Decree will

further the objectives and policies of Title VII and will be in the best interest of the Defendant, the EEOC, and the public.

For the foregoing reasons, the parties respectfully request that this Court enter the Consent Decree agreed upon by the parties and attached to this Motion.

Respectfully submitted,

A handwritten signature in cursive script, reading "Pamela S. Moore-Gibbs".

Pamela S. Moore-Gibbs
Trial Attorney

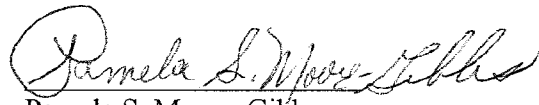
EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION

500 West Madison Street
Suite 2800
Chicago, Illinois 60661
(312) 886-9120

CERTIFICATE OF SERVICE

Pamela S. Moore-Gibbs, an attorney, hereby certifies that she caused copies of the foregoing **Motion for Entry of Consent Decree** to be served **first class mail, postage pre-paid**, on this 19th day of January 2001, to the following counsel of record:

Michael J. Leech
Tom H. Luetkemeyer
Robert H. Smeltzer
HINSHAW & CULBERTSON
222 North LaSalle
Chicago, Illinois 60601


Pamela S. Moore-Gibbs

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FOR THE CENTRAL DISTRICT OF ILLINOIS
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EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,

Plaintiff,

v.

DEB SHOPS, INC. and DEB OF
ILLINOIS, INC., d/b/a DEB SHOPS,
INC.,

Defendants.

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JONATHAN WINTERG, Clerk
U.S. DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS

NOTICE OF MOTION

To: Michael J. Leech
Tom H. Luetkemeyer
Robert H. Smeltzer
HINSHAW & CULBERTSON
222 North LaSalle
Chicago, Illinois 60601

PLEASE TAKE NOTICE that on Friday, January 19, 2001, Plaintiff Equal Employment Opportunity Commission filed with the Clerk of the United States District Court for the Central District of Illinois, Peoria Division, 100 North East Monroe, 309 Federal Building, Peoria, Illinois, the attached **Motion for Entry of Consent Decree**, a copy of which is hereby served upon you.

Dated: January 18, 2001

Pamela S. Moore-Gibbs

Pamela S. Moore-Gibbs
Trial Attorney

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