

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

KATHERINE PUFFER,
on behalf of herself and all others
similarly situated,

Plaintiffs,

v.

ALLSTATE INSURANCE COMPANY,

Defendant.

DOCKETED

SEP 02 2004

04C

5764

JUDGE LINDBERG

Jury Trial Demanded

MAGISTRATE JUDGE MASON

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CLERK
U.S. DISTRICT COURT

COMPLAINT

Plaintiff, Katherine Puffer, on behalf of herself and all others similarly situated, by and through her attorneys, Stowell & Friedman, Ltd. for her Complaint against Defendant Allstate Insurance Company states as follows:

JURISDICTION

1. Jurisdiction is based on 28 U.S.C. §§1331 and 1343, and principles of pendent and supplemental jurisdiction.

PARTIES

2. Plaintiff Katherine Puffer ("Puffer" or "Plaintiff") is a former employee of Defendant Allstate Insurance Company ("Allstate"). During her employment with Allstate, Plaintiff discharged all duties assigned to her competently and enjoyed an excellent reputation with regard to the high quality of her work and with regard to her conscientious devotion to her job.

3. Defendant Allstate is an affiliate of the Allstate Corporation ("Allstate Corp."), the largest publicly held personal lines insurer in the United States with over 40,000 employees.

Allstate Corp. offers insurance and other financial products through a number of affiliate companies, including Defendant Allstate Insurance Company.

FACTUAL ALLEGATIONS

Allstate Systemically Discriminates Against Women

4. Allstate has and continues to engage in a nationwide pattern and practice of discriminating against its female employees in the Property and Casualty business ("P & C" or Allstate). Allstate's unlawful conduct includes, but is not limited to systemic and pervasive sexual discrimination, unequal pay practices, and retaliation.

5. Allstate's discrimination against women is evidenced by lack of promotion and retention of female employees. Notwithstanding the number of people Allstate employs nationwide, its workforce is not diversified by sex.

6. During Plaintiff's employment, before and afterwards, Allstate engaged in a pattern and practice of discriminatory conduct including, but not limited to:

- a. taking into consideration gender when making employment decisions such as hiring, training, promoting, and determining salary and/or bonuses;
- b. underutilizing women;
- c. failing to credit women for their experience on the same basis as men and failing to consider women for timely promotions or title changes on the same basis as men;
- d. systematically paying women lower wages and/or denying women opportunities to increase their earnings, including bonuses;
- e. taking adverse actions against women, such as reduction in job responsibilities, demotions, transfers, constructive discharges and discharges on account of their sex and/or their rejection of or unwillingness to tolerate unwelcome sexual conduct;
- f. humiliating, intimidating, and demeaning women and otherwise creating a hostile and offensive work environment;

- g. negligently hiring and/or retaining men with known propensities to discriminate or sexually harass women;
- h. retaliating against women who complain of discrimination including subjecting them to further discrimination, harassment, retaliation, and constructively discharging them;
- i. making significant employment decisions based on sex stereotypes; and
- j. refusing to take adverse actions against male co-workers and managers who engage in sexual harassment and sexual discrimination.

7. Complicit in Allstate's pattern and practice of gender discrimination is its human resources group, which is ineffective at resolving complaints of gender discrimination so much so that many female employees recognize the futility of lodging internal complaints. Allstate's human resource department and legal department vigorously defend discriminators and otherwise encourage Allstate's standard operating procedure of retaliating against female employees who file complaints.

8. Allstate does not foster an environment where women feel free to complain of discrimination or harassment. Instead, women often feel intimidated from coming forward and fear retaliation.

9. As a result of the lack of opportunity for career advancement, the offensive work environment, and the ineffective human resource department, female employees are frequently terminated for pretextual reasons and or forced to seek transfers to business units other than P & C.

Sexual Discrimination At Allstate Is National In Scope

10. Although the named class representative worked at Allstate in Chicago, Illinois office, the class members who are relying on the class representative to protect their rights work

or worked at Allstate offices throughout the country.

11. Allstate openly recognizes that women and minorities are disproportionately represented in the firm's management and higher compensated positions, and takes public steps to window dress this issue by advertising on its web site and otherwise the existence of special programs. For example, Allstate claims that its Diversity and Work/Life Strategy is an integrated approach to attract, retain and motivate its workforce. Allstate also claims that it offers its employees Affirmative Action initiatives, Work/Life and Wellness Initiatives, Diversity Education, Recruitment, Career Advancement and Development Leadership, Accountability Measurement, Mentoring Programs, Support Networks and Community Involvement.

12. Although such diversity programs purportedly exist to help women and minorities advance within the company, in reality these programs are yet another obstacle for women and minorities and only serves to label them and highlight their differences. These programs notwithstanding, Allstate sends a message to women and minorities that they do not fit within its organization.

13. Over the years, Allstate has made little progress in improving the promotion process for women. Women are still evaluated based on subjective criteria, and as described above, are subjected to an additional level of scrutiny through Allstate's diversity programs. By comparison, Allstate take heroic steps to ensure that men are promoted to the firm's management and higher compensated positions.

14. As a result of Allstate's discriminatory selection process, women who are hired with the expectation of being promoted to higher compensated or management positions are forced to quit and are passed over for promotion. For example, as described above, women are subjected to gender stereotypes, denied mentoring, denied training, and steered into positions that provide

no opportunity for advancement. .

Allstate's Discrimination and Retaliation Against Women Is Ongoing

15. Allstate's pattern and practice of systematically discriminating and retaliating against women described above is ongoing as a continuing violation of the civil rights laws.

Plaintiff Was A Victim Of Allstate's Pattern And Practice Of Unlawful Conduct

16. Plaintiff began her employment with Allstate in 1977. Most recently, Plaintiff supervised the Program Management Office within the Property and Casualty division and held the title of Assistant Vice President

17. In May 2003, Plaintiff was unlawfully terminated on account of her gender and age, and in retaliation for opposing discriminatory practices.

18. Notwithstanding her impressive job performance and consistent with the allegations of gender discrimination against women, Plaintiff was a victim of Allstate's pattern and practice of systemic and pervasive sexual discrimination, including sexual harassment, unequal pay, and retaliation.

Plaintiff's First EEOC Charge

19. In January 2001, Plaintiff formally raised a complaint of discrimination and retaliation against Defendant with the Equal Employment Opportunity Commission ("first EEOC charge"). In her first EEOC charge, and in addition to other claims, Plaintiff alleged that Allstate intentionally created and maintained a segregated workforce where women were steered into less desirable positions and were denied career opportunities routinely extended to men. As a result of the occupational segregation at Allstate, females were denied not only job promotions and titles, but also increased earnings and other benefits. In her first EEOC charge, Plaintiff cited numerous examples of Allstate's segregated work force.

20. For example, a senior level male manager admitted steering women into less desirable positions because “women are better suited for staff positions.” Between August 1999 and January 2001 (the time Plaintiff filed her first EEOC charge), approximately 30 men were promoted to Vice President (“VP”) positions, while only three women were promoted to such positions. During that time, all 14 Property and Casualty Field VPs were males. No females reported directly to the Chairman of the Board during that time.

21. In her first EEOC charge, Plaintiff further alleged that as part of Allstate’s continuing pattern and practice of discrimination, she was subjected to unlawful gender discrimination and retaliation.

22. Specifically, Plaintiff was subjected to unlawful sexual harassment. For example, Ron McNeil (“McNeil”), Plaintiff’s immediate supervisor from late 1998 to mid 1999, made sexual overtures toward her.

23. When Plaintiff rejected those overtures, McNeil subjected her to retaliation. For example, McNeil told Plaintiff that she would not be promoted to VP because she was not “theatrical enough” and “people did not think she was very smart”. Additionally, on a later occasion, McNeil told Plaintiff that everyone thought she was a “bitch.” In addition, it was reported to Plaintiff that McNeil subjected other women to quid pro quo harassment.

24. McNeil subjected Plaintiff to other adverse actions on account of her gender and because she rejected his overtures. For example, McNeil unjustly criticized Plaintiff for not bringing enough experienced people into the department, and when she later tried to do so as he requested, he blocked her efforts and actually removed nine employees from her group. While other groups experienced slight reductions in staff, Plaintiff’s group was affected most by reductions in staff. McNeil also noticeably ignored Plaintiff’s group in department meetings,

despite her appeals to him that recognition was important for her staff.

25. McNeil also passed Plaintiff over for a promotion in favor of a less qualified male, among other adverse actions.

26. McNeil also took actions to limit Plaintiff's opportunities for advancement within the company, such as giving her a yearly evaluation that did not accurately reflect her performance. For example, in late 2000, Fred Cripe ("Cripe"), a VP, told Plaintiff that she needed to redirect her career at Allstate because McNeil did not like her and she had no future in the Property and Casualty unit.

27. Plaintiff reported these incidents to the current President of Allstate, Rick Cohen, to the legal department, and to the human resources department in December 2000. Allstate failed to conduct an adequate investigation, did not take appropriate remedial action, and threatened Plaintiff if she pursued litigation.

Allstate's Retaliation And Continued Discrimination Against Plaintiff

28. Although Plaintiff had hoped Allstate would remedy the discrimination and retaliation to which she had been subjected after she filed her first EEOC charge, Allstate's unlawful conduct only escalated thereafter and she was subjected to further discrimination and retaliation.

29. In the course of the EEOC's investigation of Plaintiff's first EEOC charge, Plaintiff identified other women whom she believed had been the victims of gender discrimination. As part of its pattern and practice of discriminating and retaliating against women, Allstate subsequently terminated all of the women Plaintiff had identified.

30. After Plaintiff filed her first EEOC charge, Plaintiff was transferred to a new department and her responsibilities were cut in half. Subsequently, Plaintiff again was

transferred to yet another department, which was Finance, still without her full responsibilities. McNeil had previously tried to get Plaintiff to transfer to the Finance division but she and the then-VP of Finance had agreed that it was not a good career move for her. Worse, Allstate made no formal announcement of Plaintiff's transfer, which otherwise was typically done, further signaling to Plaintiff that she was being singled out for adverse treatment.

31. Plaintiff was otherwise treated less favorably than others similarly situated. For example, Plaintiff was pressured to reduce her staff while other managers were not. Additionally, McNeil continued to harm Plaintiff's standing in the corporation. Further, McNeil refused to work with Plaintiff and, upon information and belief, disparaged her to other employees, including managers. McNeil's actions further damaged Plaintiff's reputation and image and, Plaintiff believes, tainted the decision-making that led to her termination (as explained below).

32. McNeil also continued to deny Plaintiff opportunities to advance her career at Allstate as retaliation. For example, Plaintiff expressed interest in obtaining an MBA degree, and McNeil and later Steve Verney (then the current VP in Finance) refused to support her efforts. Consequently, Allstate refused to pay for Plaintiff's tuition while, upon information and belief, Allstate paid such tuition for male employees and/or employees who had not complained of discrimination.

33. Allstate otherwise denied Plaintiff the same career opportunities that were extended to male employees.

34. Allstate's and McNeil's discriminatory and retaliatory actions taken against Plaintiff, including disparaging her, removing her from her position, denying her promotions, and transferring her to different departments without her full responsibilities, were intended to

interfere with her long-term career at Allstate, damage her reputation with the company, and make her vulnerable for termination.

Plaintiff's Unlawful Termination

35. Ultimately, in approximately May 2003, Plaintiff was unlawfully terminated under the pretext of a reduction in force. Plaintiff was selected for termination instead of being placed in a capital management/strategy position despite her seniority and tremendous qualifications, including being a CPA, having recently received an MBA from the University of Chicago, and having developed the initial methodology used by Allstate to allocate capital.

36. Further, although Plaintiff initially was offered a compliance position, Allstate subsequently revoked that offer without explanation.

37. As evidence that Allstate's purported reduction in force was pretext for its pattern and practice of gender discrimination, Plaintiff notes that the Property Casualty Finance department, which had the highest percentage of female officers in Allstate's Property Casualty unit, suffered the highest percentage loss of its officers in the so-called reduction in force. Moreover, while three of the five female officers in Finance were terminated, the one male officer was retained and another male officer was transferred into the Finance department.

38. Allstate took adverse actions against women over the age of forty (40). Claimant observed female employees over the age of forty pushed out of their positions and/or having their job responsibilities taken away from them.

Allstate Was Aware Of The Conduct Of Its Employees And Failed To Prevent Sexual Discrimination and Retaliation

39. Allstate's management directed, encouraged and participated in the above-described unlawful conduct.

40. Further, Allstate allowed the discrimination and retaliation to go unremedied for so long that it amounts to a policy or practice and constitutes Allstate's standard operating procedure.

41. Indeed, when Plaintiff filed her first EEOC charge, she was informed that other employees had filed similar complaints of discrimination against McNeil. Despite these charges, McNeil remained in a position of management where he was allowed to continue discriminating against Plaintiff and other women.

42. Additionally, Allstate's human resources and legal departments failed to take appropriate remedial action and, in effect, aided and abetted in the unlawful conduct.

Plaintiff Filed A Timely Representative Charge of Sexual Discrimination With The Equal Employment Opportunity Commission

43. Plaintiff filed a timely representative charge of gender discrimination, sexual discrimination and retaliation with the Equal Employment Opportunity Commission ("EEOC").

44. Plaintiff and Defendant entered into a standstill agreement on Plaintiff's claims effective May 9, 2003. The standstill agreement specifically provides that it is the parties' intent that the EEOC and this Court would honor their agreement. The parties' standstill agreement terminated on May 26, 2004.

45. The EEOC has issued a Notice of Right to Sue.

Plaintiff Suffered Extreme Emotional Distress

46. By the acts and conduct described above, Allstate intended to cause Plaintiff severe emotional distress, or acted in reckless disregard that its actions had caused and would cause Plaintiff such injury.

47. Plaintiff suffered severe emotional and mental distress as a direct and proximate

result of the conduct of Allstate.

48. The acts and conduct of Allstate constitute extreme and outrageous conduct beyond the bounds of common decency.

Plaintiff Was Injured As A Consequence Of Defendant's Unlawful Conduct

49. Plaintiff lost wages and other benefits, suffered embarrassment and humiliation and her career was irreparably injured as a result of Allstate's conduct. Plaintiff suffered loss of enjoyment of life, inconvenience and other nonpecuniary losses as a direct result of Allstate's conduct.

CLASS ALLEGATIONS

50. The class of female employees and former employees who have been subjected to discrimination by Defendant due to their sex is so numerous that joinder of all members is impracticable.

51. There are questions of law and fact common to the class.

52. The claims of the representative will fairly and adequately protect the interests of the class.

53. The questions of law and fact common to the members of the class predominate over any questions affecting only individual members and a class action is superior to other available methods for the fair and efficient adjudication of the controversy.

COUNT I

**SEXUAL DISCRIMINATION IN VIOLATION OF TITLE VII
(CLASS AND INDIVIDUAL CLAIM)**

54. Plaintiff and all others similarly situated reallege paragraphs 1 through 53 and incorporate them by reference as paragraphs 1 through 53 of Count I of this Complaint.

55. Title VII of the Civil Rights Act of 1964, 42 U.S.C. Section 2000e et seq., as amended by the Civil Rights Act of 1991, (“Title VII”) makes it unlawful to discriminate against any individual in the terms, conditions, or privileges of employment on the basis of sex.

56. Allstate has allowed the discrimination alleged herein to go unremedied for so long that it amounts to a policy or practice and constitutes Allstate’s standard operating procedure.

57. Allstate’s promotion process relies upon subjective decision making and results in under representation of women in management and highly compensated positions. The selection process fails under the EEOC’s Uniform Guidelines on Employee Selection Procedures, 29 CFR § 1607 *et seq.* and more stringent statistical analysis.

58. Accordingly, Plaintiff, on behalf of herself and all others similarly situated, allege differential treatment and disparate impact theories of liability under Title VII.

59. By its conduct described herein, Allstate subjected Plaintiff and all others similarly situated to sexual discrimination in violation of Title VII.

COUNT II

WAGE CLAIMS IN VIOLATION OF THE EQUAL PAY ACT AND TITLE VII (CLASS AND INDIVIDUAL CLAIM)

60. Plaintiff and all others similarly situated reallege paragraphs 1 to 59 and incorporate them by reference as paragraphs 1 to 59 of Count II of this Complaint.

61. The Equal Pay Act of the Fair Labor Standards Act, 29 U.S.C. Section 206 and 207, makes it unlawful for an employer on the basis of sex to pay lower wages or fringe benefits to employees of one sex than it does to similarly situated employees of the other sex. Title VII also makes it unlawful to discriminate in the payment of wages on the basis of sex.

62. Plaintiff and all others similarly situated were paid lower wages than male employees

in substantially equal jobs even though Plaintiffs and all others similarly situated performed similar duties requiring the same skill, effort, and responsibility of male employees.

63. The differential in pay between sexes was not pursuant to seniority, merit, quantity or quality of production, but was due to sex.

64. Allstate intentionally paid Plaintiff and all others similarly situated less than it paid male employees who were performing substantially equal work.

65. By its conduct as alleged herein, Allstate discriminated against Plaintiff and all others similarly situated with respect to their wages in violation of the Equal Pay Act and Title VII.

COUNT III

RETALIATION IN VIOLATION OF TITLE VII AND THE EQUAL PAY ACT (INDIVIDUAL AND CLASS CLAIM)

66. Plaintiff and all others similarly situated reallege paragraphs 1 to 65 and incorporate them by reference as paragraphs 1 to 65 of Count III of this Complaint.

67. Title VII, specifically 42 U.S.C. 2000e-3, makes it unlawful for an employer to discriminate against an employee who has opposed an unlawful employment practice or has assisted or participated in another employee's claim of discrimination. In addition, the Equal Pay Act and Fair Labor Standards Act, 29 U.S.C. Section 215(a)(3), make it unlawful for any person to discharge or in any manner discriminate against any employee because she complained of wage discrimination.

68. Plaintiff and all others similarly situated complained of sex discrimination and unfair wage practices.

69. Allstate retaliated against Plaintiff and all others similarly situated for their complaints in violation of the anti-retaliation provisions of Title VII and the Equal Pay Act. By

its conduct, Allstate subjected Plaintiff and all others similarly situated to unlawful retaliation in violation of Title VII and the Equal Pay Act.

COUNT IV

**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(INDIVIDUAL CLAIM)**

70. Plaintiff realleges paragraphs 1 to 69 and incorporates them by reference as paragraphs 1 to 69 of Count IV of this Complaint.

71. Allstate's actions through its agents against Plaintiff constitute conduct so outrageous in character and so extreme in degree as to be beyond all possible bounds of decency, and to be atrocious, and utterly intolerable in a civilized society.

72. Allstate, through its agents, intended to cause Plaintiff severe emotional distress and/or knew that there was a high probability that its conduct would cause severe emotional distress.

73. Allstate directed, encouraged, and participated in the wrongful conduct alleged herein.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff and all others similarly situated respectfully request that this Court find in their favor and against Defendant as follows:

Class Relief

a. Declare on behalf of Plaintiff individually and all other similarly situated that the acts and conduct of Allstate violate Title VII of the Civil Rights Act of 1964 and 1991 and the Equal Pay Act;

- b. Award Plaintiff and all others similarly situated the value of all compensation and benefits lost as a result of Defendant's unlawful conduct;
- c. Award Plaintiff and all others similarly situated the value of all compensation and benefits they will lose in the future as a result of Defendant's unlawful conduct under Title VII and the Equal Pay Act;
- d. In the alternative to paragraph (c), reinstate Plaintiffs and all others similarly situated with appropriate promotions and seniority and otherwise make Plaintiffs and all others similarly situated whole;
- e. Award Plaintiff and all others similarly situated compensatory damages under Title VII;
- f. Award Plaintiff and all others similarly situated punitive damages under Title VII;
- g. Award Plaintiff and all others similarly situated liquidated damages under the Equal Pay Act;
- h. Award Plaintiff and all others similarly situated prejudgment interest;
- i. Award Plaintiff and all others similarly situated reasonable attorneys' fees, costs and disbursements; and
- j. Award Plaintiff and all others similarly situated such other relief as this Court deems just and proper.

Individual Relief

k. Plaintiff incorporates by reference paragraphs (a) through (j) as paragraphs (a) through (j) of the prayer for relief for her individual claims;

l. Declare that the acts and conduct of Allstate violate Illinois common law;

m. Declare that the acts and conduct of Allstate violate the anti-retaliation provisions of the Equal Pay Act of the Fair Labor Standards Act;

n. Award Plaintiff the value of all compensation and benefits lost as a result of Defendant's unlawful conduct;

o. Award Plaintiff the value of all compensation and benefits she will lose in the future as a result of Defendant's unlawful conduct under Illinois common law;

p. In the alternative to paragraph (n), reinstate Plaintiff with appropriate promotions and seniority and otherwise make Plaintiff whole;

q. Award Plaintiff compensatory damages under Illinois common law;

r. Award Plaintiff punitive damages under Illinois common law and for retaliation under the Equal Pay Act of the Fair Labor Standards Act;

s. Award Plaintiff prejudgment interest;

t. Award Plaintiff reasonable attorneys' fees, costs and disbursements; and

u. Award Plaintiff other relief as this Court deems just and proper.

Respectfully submitted,

STOWELL & FRIEDMAN, LTD.

By 

Linda D. Friedman

Mary Stowell
Linda D. Friedman
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MSI

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

DOCKETED

SEP 02 2004

Civil Cover Sheet

This automated JS-44 conforms generally to the manual JS-44 approved by the Judicial Conference of the United States in September 1974. The data is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. The information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is authorized for use only in the Northern District of Illinois.

Plaintiff(s): Katherine Puffer, on behalf of herself and all others similarly situated

Defendant(s): Allstate Insurance Company

County of Residence: Cook

County of Residence:

Plaintiff's Atty: Mary Stowell and Linda D. Friedman
Stowell & Friedman, Ltd.
321 S. Plymouth Court, Suite
1400, Chicago, IL 60604
(312) 431-0888

Defendant's Atty:

JUDGE LINDBERG

04C 5764

II. Basis of Jurisdiction: 3 Federal Question (U.S. not a party)

MAGISTRATE JUDGE MASON

III. Citizenship of Principal Parties (Diversity Cases Only)

Plaintiff: - N/A
Defendant: - N/A

IV. Origin : 1. Original Proceeding

V. Nature of Suit: 442 Employment

VI. Cause of Action: Gender discrimination under Title VII of the Civil Rights Act of 1964, 42 U.S.C. 2000e et. seq., as amended by the Civil Rights Act of 1991 and the Equal Pay Act of the Fair Labor Standards Act 29 U.S.C. Sections 206 and 207

VII. Requested in Complaint
Class Action: Yes
Dollar Demand:
Jury Demand: Yes

VIII. This case IS NOT a refiling of a previously dismissed case.

Signature: *[Handwritten Signature]*

Date: 9/2/04

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U.S. DISTRICT COURT
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[Handwritten Signature]
9/1/2004

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

In the Matter of

EASTERN DIVISION

JUDGE LINDBERG

Katherine Puffer, on behalf of herself and all others
similarly situated, Plaintiffs,

v.
Allstate Insurance Company, Defendant.

DOCKETED

Case Number: **04C 5764**

SEP 02 2004

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEYS FOR **JUDGE MASON**

Plaintiffs

(A)		(B)	
SIGNATURE <i>Mary Stowell</i>		SIGNATURE <i>Linda D. Friedman</i>	
NAME Mary Stowell		NAME Linda D. Friedman	
FIRM Stowell & Friedman, Ltd.		FIRM Stowell & Friedman, Ltd.	
STREET ADDRESS 321 S. Plymouth Court, Suite 1400		STREET ADDRESS S. Plymouth Court, Suite 1400	
CITY/STATE/ZIP Chicago, IL 60604		CITY/STATE/ZIP Chicago, IL 60604	
TELEPHONE NUMBER (312) 431-0888	FAX NUMBER (312) 431-0228	TELEPHONE NUMBER (312) 431-0888	FAX NUMBER (312) 431-0228
E-MAIL ADDRESS mstowell@sfltd.com		E-MAIL ADDRESS lfriedman@sfltd.com	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 02750015		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 06190092	
MEMBER OF TRIAL BAR? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		MEMBER OF TRIAL BAR? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>		TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	
(C)		(D)	
SIGNATURE		SIGNATURE	
NAME		NAME	
FIRM		FIRM	
STREET ADDRESS		STREET ADDRESS	
CITY/STATE/ZIP		CITY/STATE/ZIP	
TELEPHONE NUMBER	FAX NUMBER	TELEPHONE NUMBER	FAX NUMBER
E-MAIL ADDRESS		E-MAIL ADDRESS	
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)		IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)	
MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>		MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/>	
TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>		TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/>	
DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>		DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/>	

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