

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

UNITED STATES OF AMERICA, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 ) CIVIL ACTION  
 THE SHERIFF OF LANCASTER COUNTY, ) NO.  
 a Constitutional Officer of the )  
 Commonwealth of Virginia and )  
 elected under the laws of the )  
 Commonwealth, )  
 )  
 Defendant. )  
 \_\_\_\_\_ )

JOINT MOTION FOR ENTRY OF CONSENT DECREE

The United States by the Attorney General has filed herewith its complaint in this action, alleging violations of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. Section 2000e et seq.

In resolution of the action, the parties have engaged in extensive settlement negotiations resulting in a proposed Consent Decree, also filed herewith. This proposed Decree, signed by the parties on February 25, 1983, now jointly presented by the parties to the Court for entry, resolves all of the allegations raised by the complaint.

The major purpose of the Consent Decree is two-fold: to ensure that women are considered for employment by the Sheriff of

Lancaster County as Field Deputies in the Lancaster County Sheriff's Department (the "LCSD") on an equal basis with men, and to ensure that the present effects of the Sheriff of Lancaster County's policies and practices that are alleged unlawfully to have discriminated against women and to have deprived or tended to deprive women in the rank Field Deputy are corrected.

The central provisions of the Consent Decree include:

1. An injunction against the Sheriff of Lancaster County's engaging hereafter in any act or practice with respect to the recruitment, hire or appointment of applicants for employment in the LCSD, or the training, assignment, transfer, promotion, discipline, retention, compensation or terms and conditions of employment of employees in the LCSD, which has either the purpose or effect of unlawfully discriminating against women on the basis of sex. (Paras. 2 and 3).

2. The adoption and implementation of an active and continuing recruitment program directed towards substantially increasing the number of qualified women applicants for appointment to the rank of Field Deputy in the LCSD. (Paras. 5 and 6).

3. The grant of relief to Deborah Lamb on her individual claim, including the appointment of Ms. Lamb as a full-time Field Deputy in the LCSD with retroactive seniority for all purposes in that rank as of December 6, 1976; and the grant to Ms. Lamb, through the Virginia Retirement System, of full and complete pension benefits as though she had been continuously employed as

a Field Deputy in the LCSD since that date, following payment by Ms. Lamb into the pension fund of sufficient money to satisfy all employee contributions which she would have paid had she been employed as a Field Deputy since December 6, 1976 (Paras. 6 and 8).

4. The requirement that during the life of the Decree, the Sheriff of Lancaster County shall submit annual reports to the United States, and retain and make available for inspection by the United States documents, records, and other memoranda, pertaining to the Sheriff of Lancaster County's compliance with the Decree (Paras. 10, 11 and 12).

5. The retention of jurisdiction of this action by the Court, with the understanding that any time after four (4) years from the date of entry of the Decree, the Sheriff of Lancaster County may move the Court for the dissolution of the Decree, and be entitled to such dissolution if he has complied with the Decree in all material respects (Para. 14).


The proposed Consent Decree provides both the prospective and the remedial relief which the parties believe is necessary and proper to correct the effects of the Sheriff of Lancaster County's past practices which have resulted in the alleged unlawful discrimination in employment against women. The Consent

Decree should be entered by this Court because, based upon the record in this action, its terms are lawful, reasonable, equitable and consistent with the public interest.

Respectfully submitted,

For Plaintiff United States of America,

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