

FILED

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U.S. DISTRICT COURT
CLERK'S OFFICE
BY

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,

Plaintiff,

v.

COMPUTER SCIENCES CORP.,

Defendant.

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Civil Action No. 00CA187SS

CONSENT DECREE

The parties to this Consent Decree are the Plaintiff, United States Equal Employment Opportunity Commission ("EEOC"), and Defendant, Computer Sciences Corporation ("CSC"). This Consent Decree resolves the above-referenced Civil Action No. A-00-CA-187SS. The EEOC initiated this lawsuit under the Equal Pay Act of 1963, Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e, et seq. ("Title VII"), and Title I of the Civil Rights Act of 1991, 42 U.S.C. § 1981a. The First Amended Complaint was filed on behalf of a class comprised of two individuals, Margaret Wolford ("Wolford") and Jennifer Nelson ("Nelson"), to correct alleged unlawful employment practices occurring at CSC's Financial Services Group division on the basis of sex, and to provide appropriate relief to Wolford and Nelson, whom the EEOC claims were adversely affected by these alleged practices. The EEOC alleges that CSC allowed Wolford to be subjected to disparate treatment based on her sex, female, in that CSC paid her at a wage rate which was less than the rate paid to the male employee who replaced her and who was performing substantially equal work. The EEOC alleges that CSC allowed Nelson to

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be subjected to disparate treatment based on her sex, female, in that CSC paid her at a wage rate which was less than the rate paid to a male employee in her department and who was performing substantially equal work. CSC denies the allegations brought by the EEOC as alleged in the First Amended Complaint filed in this Civil Action.

CSC and the EEOC wish to settle this action, without the necessity and costs of further and future litigation, pursuant to the terms delineated in this Consent Decree.

IT IS ORDERED, ADJUDGED AND DECREED as follows:

1. This Court has jurisdiction of the subject matter of the action and the parties, venue is proper, and all administrative prerequisites to the filing of this action have been met. The parties stipulate to the Court's jurisdiction.

2. This Decree is entered in full and complete settlement of all claims contained in this lawsuit and resolves the EEOC charges filed by Wolford (charge no. 36A 98 0314) and Nelson (charge no. 360 AO 0220) with the EEOC. EEOC agrees not to pursue any litigation against CSC in the future on behalf of Wolford or Nelson arising out of charge nos. 36A 98 0314 and 360 AO 0220, except to the extent necessary to enforce the terms of this consent decree. EEOC expressly reserves its right to process and litigate any other charges which may be pending currently or may in the future be filed against CSC.

3. The duration of this Consent Decree shall be three years from the date of its filing with the Court. This Court shall retain jurisdiction of this action during the period of this Consent Decree and may enter further orders or modifications as may be appropriate.

4. CSC, a corporation with nation and world-wide offices, is the proper party to this action. However, both Wolford and Nelson's direct employer and the site where the alleged unlawful employment practices occurred was CSC's Financial Services Group, a division of CSC located in Austin, Texas. All terms of relief set forth in this Decree are therefore limited to CSC's Financial Services Group in Austin, Texas ("CSC FSG").

5. CSC FSG is enjoined from engaging in discriminatory treatment of its employees based on their sex, or any other impermissible reason, including disparate treatment as to pay because of his/her sex.

6. CSC FSG is enjoined from retaliating in any manner whatsoever, against Wolford and Nelson, for opposing any employment practice made unlawful by Title VII or the Equal Pay Act, or for filing a discrimination charge, giving testimony or assistance, or participating in any manner in any investigation, proceeding, hearing or action under Title VII and the Equal Pay Act.

7. Within 180 days of the date of entry of this Decree, CSC FSG shall provide EEO training to its supervisory/managerial employees. The training will be conducted by the undersigned counsel for CSC and may take place in separate programs. Each supervisory/managerial employee will participate in the training for a total of 4 hours. The training shall: (a) explain that sex and other Title VII protected-status discrimination is unlawful; (b) instruct what conduct may constitute discriminatory conduct on the basis of sex; and (c) explain the damaging effects of sex discrimination to victims, their families, their co-workers, and the workplace environment. A copy of the training presentation outline will be sent to the EEOC at least 10 days before the training

session occurs. The EEOC shall have the right to approve the training. Within 20 days after the EEO training has been completed, defendant shall provide to the EEOC a written report identifying each individual who attended this training and the date(s).

8. CSC FSG shall post a notice, for at least the duration of this Decree, of its intent to comply with Title VII and the Equal Pay Act. This notice is set forth in Exhibit "A," which is attached to this Decree. CSC FSG agrees to post a copy of Exhibit "A" in a conspicuous place at its facilities in Austin, Texas, within ten days after this Decree is filed.

9. CSC FSG shall provide at least a neutral reference for Wolford and Nelson to anyone inquiring as to their work history with CSC FSG, including prospective employers who may request such a reference. CSC FSG also agrees not to disclose the filing of this Complaint, or the underlying charges filed by Wolford and Nelson, to any prospective employers who may inquire to CSC FSG about their work history with CSC FSG. This provision shall survive the expiration of the Decree.

10. CSC, in settlement of this dispute, shall pay to Wolford, the sum total of \$15,000 (FIFTEEN THOUSAND DOLLARS AND NO CENTS). Payment shall be made by CSC or its agent within thirty (30) days of the date this Decree is entered by the Court. Payment shall be by check made payable to Margaret Wolford, 16704 Black Kettle Drive, Leander, Texas 78641. Wolford consents to and accepts all terms of this consent decree, as evidenced by her Release of Claims, attached hereto as Exhibit "B."

11. CSC, in settlement of this dispute, shall also pay to Nelson, the sum total of \$5,000 (FIVE THOUSAND DOLLARS AND NO CENTS). Payment shall be made by CSC or its agent within thirty (30) days of the date this Decree is entered by the

Court. Payment shall be by check made payable to Jennifer Nelson, P.O. Box 50091, Austin Texas, 78763. Nelson consents to and accepts all terms of this consent decree, as evidenced by her Release of Claims, attached hereto as Exhibit "C."

12. A copy of the settlement checks and any accompanying transmittal documents shall be forwarded to the EEOC to the attention of Robert B. Harwin, Regional Attorney, 5410 Fredericksburg Road, Suite 200, San Antonio, Texas 78229.

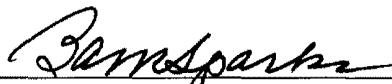
13. The terms of this Consent Decree shall be binding upon the EEOC and CSC, its agents or its assigns, as to the issues resolved herein.

14. The parties to this Decree shall bear their own costs and attorneys' fees incurred in this action. The parties agree that pursuant to Section 706(k) of Title VII, 42 U.S.C. § 2000e-5(k), there is no "prevailing party" in this action or proceeding.

The Clerk shall furnish a copy hereof to each attorney of record.

SO ORDERED.

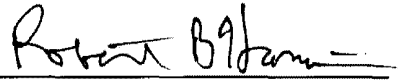
Signed this 25th day of September, 2000.


HONORABLE SAM SPARKS
United States District Judge

Respectfully Submitted,

C. GREGORY STEWART
General Counsel

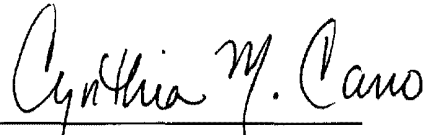
GWENDOLYN YOUNG REAMS
Associate General Counsel



ROBERT B. HARWIN
Regional Attorney
D.C. State Bar No. 076083



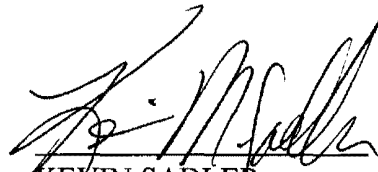
LINDA GUTIERREZ
Supervisory Trial Attorney
Texas State Bar No. 08642750



CYNTHIA CANO
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Texas State Bar No. 00790420

EQUAL EMPLOYMENT
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ATTORNEYS FOR DEFENDANT

NOTICE TO ALL EMPLOYEES

COMPUTER SCIENCES CORPORATION FINANCIAL SERVICES GROUP IS FIRMLY COMMITTED TO TREATING EMPLOYEES AND APPLICANTS FOR EMPLOYMENT ACCORDING TO MERIT WITHOUT REGARD TO THEIR RACE, RELIGION, COLOR, NATIONAL ORIGIN, SEX, OR THEIR HAVING ENGAGED IN ACTIVITY PROTECTED BY TITLE VII OF THE CIVIL RIGHTS ACT OF 1964, AS AMENDED. THIS POLICY APPLIES TO ALL EMPLOYMENT DECISIONS, INCLUDING RECRUITMENT, RETENTION, PROMOTION, TRANSFER, LAYOFF AND/OR TERMINATION, AND ALL OTHER TERMS AND CONDITIONS OF EMPLOYMENT. COMPUTER SCIENCE CORPORATION FINANCIAL SERVICES GROUP WILL SPECIFICALLY NOT TOLERATE DISCRIMINATION OF ITS EMPLOYEES BASED ON RACE, COLOR, SEX, RELIGION, NATIONAL ORIGIN, AGE OR DISABILITY.

IF YOU BELIEVE YOU ARE BEING DISCRIMINATED AGAINST IN ANY TERM OR CONDITION OF YOUR EMPLOYMENT BECAUSE OF YOUR RACE, RELIGION, COLOR, NATIONAL ORIGIN, SEX, AGE, OR DISABILITY; OR THAT YOU ARE BEING SUBJECTED TO HARASSMENT BECAUSE OF YOUR RACE, RELIGION, COLOR, NATIONAL ORIGIN, SEX, AGE OR DISABILITY; OR BECAUSE OF HAVING ENGAGED IN TITLE VII-PROTECTED ACTIVITY, YOU ARE ENCOURAGED TO SEEK ASSISTANCE FROM SUPERVISORY PERSONNEL, OR FROM THE UNITED STATES EQUAL EMPLOYMENT OPPORTUNITY COMMISSION, 5410 FREDERICKSBURG ROAD, SUITE 200, SAN ANTONIO, TEXAS 78229-3550, (210) 281-7600 OR 1-800-669-4000.

NO RETALIATORY ACTION MAY BE TAKEN AGAINST YOU FOR SEEKING ASSISTANCE, FILING A CHARGE, OR COMMUNICATING WITH THE UNITED STATES EQUAL EMPLOYMENT OPPORTUNITY COMMISSION.

EEOC ENFORCES TITLE VII OF THE CIVIL RIGHTS OF 1964, WHICH PROHIBITS EMPLOYMENT DISCRIMINATION BASED ON RACE, COLOR, RELIGION, SEX OR NATIONAL ORIGIN; THE AGE DISCRIMINATION IN EMPLOYMENT ACT; THE EQUAL PAY ACT; PROHIBITIONS AGAINST DISCRIMINATION AFFECTING INDIVIDUALS WITH DISABILITIES IN THE FEDERAL SECTOR; SECTIONS OF THE CIVIL RIGHTS ACT OF 1991, AND TITLE I OF THE AMERICANS WITH DISABILITIES ACT, WHICH PROHIBITS DISCRIMINATION AGAINST PEOPLE WITH DISABILITIES IN THE PRIVATE SECTOR AND STATE AND LOCAL GOVERNMENTS.

EXHIBIT "A"

Exhibit "B"

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,

Plaintiff,

v.

COMPUTER SCIENCES CORP.,

Defendant.

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Civil Action No. 00CA187-SS

RELEASE OF CLAIMS BY MARGARET WOLFORD

1. My name is Margaret Wolford. I am over twenty-one years of age, have never been convicted of a crime, and am fully competent to make this declaration. I have personal knowledge of the facts contained herein and all such facts are true and correct.

2. I am one of two charging parties in the matter of Equal Employment Opportunity Commission ("EEOC") vs. Computer Sciences Corporation ("CSC"). My charge of discrimination filed with the EEOC, charge no. 36A 98 0314, is the basis of this suit.

3. I have reviewed the terms of the consent decree. I consent to all terms of the consent decree, and specifically to the relief provided to me. I accept the relief provided in release of all claims raised in my EEOC charge against CSC. I understand that I bear the responsibility to pay all taxes owed in connection with this payment and indemnify and hold CSC harmless for any such liability.

4. I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed at Austin, Texas on August 21, 2000.


Margaret Wolford

Exhibit "C"

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,

Plaintiff,

v.

COMPUTER SCIENCES CORP.,

Defendant.

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Civil Action No. 00CA187-SS

RELEASE OF CLAIMS BY JENNIFER NELSON

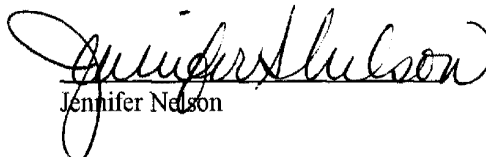
1. My name is Jennifer Nelson. I am over twenty-one years of age, have never been convicted of a crime, and am fully competent to make this declaration. I have personal knowledge of the facts contained herein and all such facts are true and correct.

2. I am one of two charging parties in the matter of Equal Employment Opportunity Commission ("EEOC") vs. Computer Sciences Corporation ("CSC"). My charge of discrimination filed with the EEOC, charge no. 360 AO 0220, is the basis of this suit.

3. I have reviewed the terms of the consent decree. I consent to all terms of the consent decree, and specifically to the relief provided to me. I accept the relief provided in release of all claims raised in my EEOC charge against CSC. I understand that I bear the responsibility to pay all taxes owed in connection with this payment and indemnify and hold CSC harmless for any such liability.

4. I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed at Austin, Texas on August 26, 2000.


Jennifer Nelson