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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA SOUTHERN DIVISION 03 MAR 13 PM 4:17 U.S. DISTRICT COURT N.D. OF ALABAMA

CARL WRIGHT, individually and on behalf of others similarly situated, Plaintiffs, FELICIA D. CARTER, Plaintiff-Intervenor, vs. SOUTH CENTRAL BELL, BELLSOUTH TELECOMMUNICATIONS, and COMMUNICATIONS WORKERS OF AMERICA, Defendants.

Civil Action Number: 93-C-1530-S

JOINT MOTION AND STIPULATION CONCERNING PROPOSED SETTLEMENT AGREEMENT

COME NOW the parties in the above-referenced legal action and jointly move this Honorable Court to issue an Order preliminarily approving the proposed Settlement Agreement (attached hereto as Exhibit "1") and directing appropriate individual notice to the previously certified class. In support of this Motion, the parties state as follows:

- 1. Defendant BellSouth Telecommunications, Inc., formerly d/b/a South Central Bell ("Defendant") and Plaintiff Carl D. Wright ("Plaintiff"), through Class Counsel Gordon, Silberman, Wiggins & Childs, P.C., ("Class Counsel"), have reached agreement on this proposed Settlement Agreement after a long period of difficult,

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arms-length negotiations in which they have considered all facets of the litigation and the proposed settlement, including the fairness of the settlement to the Plaintiff and the Settlement Class Members.

2. The parties jointly certify to the Court that they believe this settlement is fair and reasonable, that the relief therein is adequate and sufficient for all Settlement Class Members, and that any disparity between the recovery afforded the Plaintiff and certain other designated class members (collectively, the "Designated Settlement Class Members") and the recovery afforded other non-designated Settlement Class Members is a result of the consideration of appropriate factors, such as the Plaintiff's leadership in regard to the preparation for, and the filing, litigation, trial and ultimate settlement of this lawsuit, the Settlement Class Representatives' and the Designated Settlement Class Members' substantial time and effort expended in the prosecution of this case, including the submission of individual discovery responses and the preparations for and taking of their depositions by Defendant, and the required execution by the Settlement Class Representatives and the Designated Settlement Class Members of a broader release of claims in order to receive their Individual Monetary Award under the proposed Settlement Agreement.
3. The parties attach hereto a copy of a proposed Order Preliminarily Approving Proposed Settlement Agreement, which Order is designated as Exhibit "2," and jointly move that this Order be adopted and issued by the Court.

4. The parties also attach hereto a proposed Notice of Hearing to Consider Proposed Settlement Agreement (attached hereto as Exhibit "3"), a proposed Claim Form (attached hereto as Exhibit "4"), a proposed General Release for execution by the Settlement Class Representatives and the Designated Settlement Class Members who receive an Individual Monetary Award (attached hereto as Exhibit "5"), and a proposed Release for execution by all other Settlement Class Members who receive an Individual Monetary Award (attached hereto as Exhibit "6"), and move that this Court approve the said Notice, Claim Form, General Release and Release, and authorize, as part of its preliminary approval of the proposed Settlement Agreement, the issuance of said Notice to each Settlement Class Member. Upon final approval of the proposed Settlement Agreement, the parties shall distribute the Claim Form and pertinent release form to each Settlement Class Member who is successfully located during the notice distribution process.
5. Subject to any objections that may be received from any Settlement Class Member(s), but over any such objections, the parties respectfully recommend and request that the proposed Settlement Agreement be herewith adopted in its entirety by the Court.

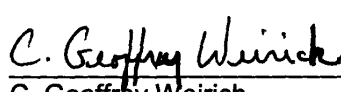

WHEREFORE, the parties respectfully request that this Motion be forthwith granted, that the Order Preliminarily Approving Proposed Settlement Agreement be entered by this Court, and that a hearing be scheduled and held as specified therein.

Respectfully submitted this 13th day of March, 2003.



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**EXHIBITS TOO LARGE FOR
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