

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

CLAUDINE WILFONG, et al.,	)	
	)	
Plaintiffs,	)	
	)	
and	)	
	)	
EQUAL EMPLOYMENT OPPORTUNITY	)	
COMMISSION,	)	
	)	
Plaintiff-Intervenor,	)	
v.	)	Civil Action No. 00-680-DRH
	)	
	)	
RENT-A-CENTER, INC.,	)	
	)	
Defendant.	)	
_____	)	

**PLAINTIFF AND PLAINTIFF-INTERVENOR’S JOINT MOTION FOR  
DISTRIBUTION OF THE BALANCE OF THE SETTLEMENT FUND TO CHARITIES**

Plaintiffs and Plaintiff-Intervenor request that the court approve the following distribution of the balance of the Settlement Fund, pursuant to the Section VII B 5 of the Consent Decree approved by this Court. The Decree provides that:

If there are monies remaining in the Settlement Fund but the amount is insufficient to trigger redistribution, then the balance shall be paid to one or more public or not-for-profit organizations, one of whose primary purposes is to benefit women’s workplace interests. Class Counsel and Counsel for the EEOC shall determine the organization(s) that will receive such funds, subject to Court approval, and will notify RAC of this determination.

The monies remaining in the Settlement Fund at present are approximately \$80,000.00.

The costs of the redistribution of this amount would include the costs of preparing several thousand bank checks, purchasing envelopes and letterhead, preparing an explanatory letter, postage and photocopying, and the Settlement Administrator’s time spent in preparing the

mailing and recording returned mail, speaking with class members who have questions about the checks and potentially handling banking problems, as well as other incidental costs. These costs would substantially diminish the amount that could be redistributed such that the actual checks would have a gross amount of less than one hundred dollars. Therefore, counsel for Plaintiffs and the EEOC propose that the following not-for-profit organizations, all devoted in whole or in large part to women's workplace interests, be paid the full balance of the Settlement Fund as follows:

1. Twenty thousand dollars (\$20,000.00) to Women In Charge, a St. Louis, Missouri, non-profit organization, at 1340 Partridge Avenue, St. Louis, Missouri, 63130.
2. Fifteen thousand dollars (\$15,000.00) to Dress for Success, a Wichita, Kansas, non-profit organization, at 1422 North High Street, Wichita, Kansas, 67203.
3. The balance of the Settlement Fund (about \$45,000.00) of the Settlement Fund to Workplace Fairness, a national non-profit organization, at 44 Montgomery Street, Suite 2080, San Francisco, California, 94104.

A proposed Order is enclosed.

Respectfully submitted,

/s/ Donna L. Harper

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DONNA L. HARPER  
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/s/ Mary Anne Sedey

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/s/ Jerome J. Schlichter

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The undersigned hereby certifies that a copy of the foregoing was served by operation of the Court's electronic filing system, to Mr. Dan Dargene, Winstead, Sechrest & Minick P.C., 5400 Renaissance Tower, 1201 Elm Street, Dallas, TX 75270, this 19<sup>th</sup> day of November, 2004.

/s/ Mary Anne Sedey

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