

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

U.S. DISTRICT COURT  
CLERK

FILED-EDS  
FEB 15 PM 4:51 2002

DOCKETED  
FEB 19 2002

Jerrold Goldberg, Glenn Gentile, and Willie Jiles,

Plaintiffs,

v.

Durham Transportation d/b/a Durham School Services, a subsidiary of National Express Group; and Madeline Cooley, individually,

Defendants.

JUDGE JOAN H. LEFKOW  
**02C 1125**  
MAGISTRATE JUDGE NOLAN

**Complaint for Violations of 42 U.S.C. § 2000e, et seq.  
(Title VII of the Civil Rights Act of 1964),  
42 U.S.C. § 1981, and Violation of 42 U.S.C. § 2001e-3(a)  
(Section 704(a) of Title VII of the Civil Rights Act of 1964)<sup>1</sup>**

Plaintiffs, Jerrold Goldberg, Glenn Gentile, and Willie Jiles, by and through their attorneys, Aaron B. Maduff and Deanne Medina, of Maduff & Maduff, for their complaint against Durham School Services and Madeline Cooley allege and state as follows:

**Introduction**

1. This action results from racial discrimination in employment occasioned by the acts of Defendant Madeline Cooley, Base Manager of Defendant Durham School Services, who is responsible for assigning school bus routes and charters to Durham Drivers including the Plaintiffs. At first, Defendant Cooley, an African-American, began reducing and eliminating the routes and charters of Caucasian drivers specifically including Plaintiff Goldberg. When Plaintiff Goldberg began to object, Plaintiffs Jiles and Gentile supported him in that objection and his efforts to seek legal redress, including his filing a complaint with the United States Equal Employment Opportunity Commission. In retaliation, Defendant Cooley began reducing and eliminating bus routes and charters for Plaintiffs Jiles and Gentile, and either terminated, or conspired to terminate Plaintiff

<sup>1</sup>Plaintiff may amend this complaint at a later date to make it a class action complaint.

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Goldberg based on false accusations of an accident. Thereafter, all three Plaintiffs filed complaints with the Equal Employment Opportunity Commission for retaliation. Plaintiffs Jiles and Gentile were then also terminated or have had charters reduced to a token amount.

### **Parties**

2. Plaintiff Jerrold Goldberg, (hereinafter "Jerrold" or "Plaintiff Goldberg", is a citizen of the State of Illinois and resides within the territorial limits of the United States District Court for the Northern District of Illinois, Eastern Division. Plaintiff is Caucasian.

3. Plaintiff Willie Jiles, (hereinafter "Willie" or "Plaintiff Jiles", is a citizen of the State of Illinois and resides within the territorial limits of the United States District Court for the Northern District of Illinois, Eastern Division.

4. Plaintiff Glenn Gentile, (hereinafter "Glenn" or "Plaintiff Gentile", is a citizen of the State of Illinois and resides within the territorial limits of the United States District Court for the Northern District of Illinois, Eastern Division.

5. On information and belief, Defendant, Durham Transportation d/b/a Durham School Services (hereinafter "Defendant Durham"), is a subsidiary of National Express Group and is a corporation licensed and doing business within the territorial limits of the United States District Court for the Northern District of Illinois, Eastern Division. On information and belief Defendant Durham employs more than 500 persons.

6. Defendant Madeline Cooley aka Madeline Conway aka Madeline Cooley-Conway (hereinafter "Defendant Cooley" or "Cooley") is an individual who on information and belief lives within the territorial jurisdiction of the United States District Court for the Northern District of Illinois, Eastern Division. At all times relevant hereto, Defendant Cooley was Defendant Durham's Skokie Base Manager and had responsibility and authority to assign routes and charters to drivers. Defendant Cooley is of African-American decent.

### **Jurisdiction**

7. On November 7, 2001, Plaintiff Goldberg filed a charge of discrimination against Defendant Durham with the United States Equal Employment Opportunity Commission (EEOC), Chicago office, Charge No. 210A20524, for racial discrimination in employment.

8. On November 14, 2001, Plaintiff Jiles filed a charge of discrimination against Defendant Durham with the United States Equal Employment Opportunity Commission (EEOC), Chicago office, Charge No. 210A20612, for retaliation for supporting Plaintiff Goldberg in his attempts to redress his grievances for racial discrimination.

9. On November 14, 2001, Plaintiff Gentile filed a charge of discrimination against Defendant Durham with the United States Equal Employment Opportunity Commission (EEOC), Chicago office, Charge No. 210A20616, for retaliation for supporting Plaintiff Goldberg in his attempts to redress his grievances for racial discrimination.

10. On November 14, 2001, Plaintiff Goldberg filed a second charge of discrimination against Defendant Durham with the United States Equal Employment Opportunity Commission (EEOC), Chicago office, Charge No. 210A20611, for retaliation for having met with counsel and for having filed the first charge of discrimination.

11. On November 20, 2001, the EEOC mailed a Notice of Right to sue to Plaintiff Jiles relating to his Charge of Retaliation, Charge Number 210A20612 by certified mail. The letter was received by Plaintiff Jiles several days thereafter.

12. On December 6, 2001, the EEOC mailed a Notice of Right to sue to Plaintiff Goldberg relating to his Charge of Discrimination, Charge Number 210A20524 by certified mail. The letter was received by Plaintiff Goldberg several days thereafter.

13. On January 28, 2002, the EEOC mailed a Notice of Right to sue to Plaintiff Gentile relating to his Charge of Retaliation, Charge Number 210A20616 by certified mail. The letter was received by Plaintiff Gentile several days thereafter.

14. On December 7, 2001, the EEOC mailed a Notice of Right to sue to Plaintiff Goldberg relating to his Charge of Retaliation, Charge Number 210A20611 by certified mail. The letter was received by Plaintiff Goldberg several days thereafter.

15. This action is brought for violations of 42 U.S.C. § 2000e *et seq.*, (Title VII of the Civil Rights Act of 1964), (hereinafter "Title VII") and 42 U.S.C. § 1981. Jurisdiction of this Court is founded upon 28 U.S.C. § 1343(a)(3) and (4).

### Venue

16. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b) as, on information and belief, all Defendants reside in this District and the facts giving rise to this cause of action occurred in this District.

### Events

#### DURHAM'S BUSINESS

17. Defendant Durham is a bus company operating out of bases in Evanston, Skokie, and Chicago, Illinois.

18. From these bases, Durham has two kinds of business: school routes and charters.

19. On the school routes, Drivers are paid a fixed amount per route. On the charter routes, drivers are paid a percentage of the charter fee.

20. Because Durham negotiates each charter fee individually with the client, some charters produce more money than others, and as a result, are worth more to the driver who takes a percentage.

#### MADELINE COOLEY

21. Defendant Cooley was hired by Durham as the Base Manager for its Skokie Base in approximately June of 2000.

22. Prior to the hiring of Defendant Cooley, Drivers were assigned charters or routes based first on a request by a client, and absent a request for a particular driver, by moving down a list in order of seniority.

23. As a result of that system, Jerrold Goldberg was taking approximately 6.5 Charters per week and making approximately \$700 per week.

24. As a result of that system, Willie Giles was taking approximately 5 Charters per week and making approximately \$600 per week.

25. As a result of that system, Glenn Gentile was taking approximately 4 Charters per week and making approximately \$500 on an annual basis.

JERROLD GOLDBERG

26. Jerrold Goldberg is a Caucasian individual who was hired by Durham in January of 1999 as a bus driver.

27. Between January of 1999 and approximately June of 2000 (the time of the hiring of Defendant Cooley, Jerrold had a clean record and disciplinary action had not been taken against him for misconduct.).

28. Beginning in June of 2000 shortly after her training was completed, Defendant Cooley began a campaign of verbal harassment against Jerrold and other Caucasian drivers.

29. In September, Cooley began denying Jerrold numerous charter bus runs and daily school bus routes to which he was entitled by seniority or request. This included both a decrease in the number of routes and charters, and those charters that Jerrold did get were less financially remunerative and desirable than those he had previously been getting and those for which he was requested. These assignments and the wages therefrom were instead assigned by Cooley to African-American drivers.

30. On or about August 31, 2001 Jerrold complained to Defendant Cooley that he felt he was being subjected to race discrimination concerning the charter assignments.

31. On or about October 2, 2001, Defendant Cooley suspended Plaintiff Goldberg for objecting to her failure to tell him of routes. No drivers at the Skokie Base had been suspended for such things prior to the arrival of Defendant Cooley, and after her arrival, African-American drivers who did not support their Caucasian co-workers against race discrimination were not suspended or disciplined as severely after engaging in more egregious offenses.

32. As a result of these actions, on November 7, 2001, Jerrold filed his first charge with the EEOC.

33. Beginning on or about October 3, 2001, Jerrold was subjected to false accusations of misconduct by Defendant Cooley, including an untrue allegation that his bus was involved in an accident which he failed to report in about November 2001.

34. Durham terminated Goldberg's employment at Durham on November 8, 2001.

WILLIE JILES

35. Willie Jiles, an African-American male, was hired by Durham in about January 1999 as a Bus Driver.

36. Prior to the hiring of Defendant Cooley, Willie received praise from his supervisors and peers for his work performance.

37. Beginning on or about October 3, 2001, Willie began expressing his support for the complaints of racial discrimination voiced by many of his Caucasian coworkers, including Jerrold Goldberg.

38. Beginning on or about October 4, 2001, Cooley began denying Willie numerous charter bus runs to which he was entitled by seniority or request. This included a decrease in the number of charters, and those charters that Willie did get were less financially remunerative and desirable than those he had previously been getting and those for which he was requested.

39. Since that time, Durham has paid Willie lower wages (a result of fewer and less desirable charters being assigned by Defendant Cooley) than it has paid to African-American employees who have not openly or otherwise supported their Caucasian co-workers.

40. When Defendant Cooley became aware that Willie had filed his EEOC Charge of Discrimination on November 14, 2001, she began subjecting him to altered terms, conditions and privileges of employment, including decreasing his charters to one per week.

GLENN GENTILE

41. Glenn Gentile, an African-American male, was hired by Durham in January 1999 as a Bus Driver and terminated by Durham on December 6, 2001.

42. Glenn's job performance throughout his employment with Defendant has been satisfactory.

43. Beginning on or about October 3, 2001 Glenn began expressing his support for the complaints of racial discrimination voiced by many of his Caucasian coworkers, including Jerrold Goldberg.

44. Beginning on approximately October 4, 2001, Plaintiff Gentile was assigned less-desirable school routes and has been denied charter assignments despite seniority and requests.

45. Since that time, Durham has paid Glenn lower wages (a result of fewer and less desirable charters being assigned by Defendant Cooley) than it has paid to African-American employees who have not openly or otherwise supported their Caucasian co-workers.

46. Glenn was present at the scene of an accident on November 3, 2001 and witnessed a bus hit a vehicle.

47. Because Glenn was familiar with Jerrold Goldberg's bus, he was able to recognize that the bus involved in the accident was not Jerrold's. It had a different shape than Jerrold's bus, and a different number than Jerrold's bus.

48. When Jerrold was accused of this accident and failing to report it, Glenn came forward and specifically noted that the bus involved in the accident could not have been Jerrold's bus.

49. Thereafter, the decline in work that Defendant Cooley was assigning to Glenn became far more dramatic, he was ridiculed, and was given even fewer charters.

50. On November 14, 2001, Glenn filed his Charge of Retaliation based on having supported Caucasian co-workers in their complaints of discrimination and more significantly, for having supported Jerrold in the false charge that Jerrold had failed to report an accident in which he was allegedly involved.

51. When Defendant Cooley became aware that Glenn had filed his EEOC Charge of Discrimination on November 14, 2001, she decreased his work to the point of constructively discharging him and actually terminated his employ on or about December 6, 2001.

52. Plaintiffs on numerous occasions attempted to address the discrimination with Durham, moving through the hierarchy and finally ending with the corporate offices in Austin, Texas, but Durham has refused to deal with the situation.

**Count I**

**Plaintiff Jerrold Goldberg's Demand for Relief for  
Racial Discrimination in Employment  
In Violation of Title VII of the Civil Rights Act of 1964  
Against Defendant Durham Transportation**

53. Plaintiff Jerrold Goldberg restates and realleges paragraphs 1 through 52 as paragraph 53 of this Count I.

54. By virtue of the foregoing, Defendant Durham Transportation has subjected Plaintiff Jerrold Goldberg to Discrimination in the terms and conditions of his employment based upon his race in violation of Title VII of the Civil Rights Act of 1964.

55. As a result of this violation, Plaintiff Goldberg has suffered emotional distress, humiliation, degradation, medical injury, and other damages of both a pecuniary and non-pecuniary nature.

56. In light of the continued violations and retaliation against Plaintiff Goldberg and others who supported him, Durham's conduct is wilful and malicious warranting the imposition of punitive damages.

WHEREFORE, Plaintiff, Jerrold Goldberg, respectfully requests that this Honorable Court enter judgment in his favor and against Defendant Durham Transportation for compensatory damages in an amount to be determined at trial, for punitive damages in an amount to be determined at trial, and for such other and further relief this Court deems just and equitable.

**Count II**

**Plaintiff Jerrold Goldberg's Demand for Relief for  
Race Based Discrimination  
In the Making and Performance of Contract  
In Violation of 42 U.S.C. § 1981  
Against Defendant Madeline Cooley**

57. Plaintiff Jerrold Goldberg restates and realleges paragraphs 1 through 52 as paragraph 57 of this Count II.



58. By virtue of the foregoing, Defendant Madeline Cooley has subjected Plaintiff to Discrimination in the terms and conditions of his employment contract based upon his race in violation of 42 U.S.C. § 1981.

59. As a result of this violation, Plaintiff Goldberg has suffered emotional distress, humiliation, degradation, medical injury and other damages of both a pecuniary and non-pecuniary nature.

60. In light of her continued violations and her retaliation against Plaintiff Goldberg and others who supported him, her conduct is wilful and malicious warranting the imposition of punitive damages.

WHEREFORE, Plaintiff, Jerrold Goldberg, respectfully requests that this Honorable Court enter judgment in his favor and against Defendant Madeline Cooley for compensatory damages in an amount to be determined at trial, for punitive damages in an amount to be determined at trial, and for such other and further relief this Court deems just and equitable.

**Count III**

**Plaintiff Jerrold Goldberg's Demand for Relief for  
Race Based Discrimination  
In the Making and Performance of Contract  
In Violation of 42 U.S.C. § 1981  
Against Defendant Durham Transportation Services**

61. Plaintiff Jerrold Goldberg restates and realleges paragraphs 1 through 52 as paragraph 61 of this Count III.

62. By virtue of the foregoing, Defendant Durham has subjected Plaintiff to Discrimination in the terms and conditions of his employment contract based upon his race in violation of 42 U.S.C. § 1981 in that Durham has refused to address the discrimination, thereby approving it.

63. As a result of this violation, Plaintiff Goldberg has suffered emotional distress, humiliation, degradation, medical injury and other damages of both a pecuniary and non-pecuniary nature.

64. In light of Durham's continued violations and retaliation against Plaintiff Goldberg and others who supported him, its conduct is wilful and malicious warranting the imposition of punitive damages.

WHEREFORE, Plaintiff, Jerrold Goldberg, respectfully requests that this Honorable Court enter judgment in his favor and against Defendant Durham for compensatory damages in an amount to be determined at trial, for punitive damages in excess of \$1,000,000, and for such other and further relief this Court deems just and equitable.

#### **Count IV**

#### **Plaintiff Jerrold Goldberg's Demand for Relief for Retaliation in Violation of § 704(a) of Title VII of the Civil Rights Act of 1964 Against Defendant Durham Transportation Services**

65. Plaintiff Jerrold Goldberg restates and realleges paragraphs 1 through 52 as paragraph 65 of this Count III.

66. By virtue of the foregoing, Durham Transportation has retaliated against Plaintiff Goldberg because he filed a charge of discrimination or otherwise participated in a complaint process in an effort to protect his rights under Title VII of the Civil Rights Act of 1964 as amended, and participated in an investigation, proceeding or hearing under Title VII of the Civil Rights Act of 1964, as amended in violation of that act.

67. As a result of this violation Plaintiff Goldberg has suffered emotional distress, humiliation, degradation, medical injury, loss of his employment with Defendant Durham Transportation and other damages of both a pecuniary and non-pecuniary nature.

68. The actions of Defendant Durham Transportation in retaliating against Plaintiff Goldberg were taken with malice or with reckless disregard of Plaintiff's rights warranting the imposition of punitive damages.

WHEREFORE, Plaintiff, Jerrold Goldberg, respectfully requests that this Honorable Court enter judgment in his favor and against Defendant Durham Transportation for compensatory damages in an amount to be determined at trial, for punitive damages in an amount to be determined at trial, and for such other and further relief as this Court deems just and equitable.

**Count V**

**Plaintiff Willie Jiles'  
Demand for Relief for Retaliation in Violation of  
§ 704(a) of Title VII of the Civil Rights Act of 1964  
Against Defendant Durham Transportation Services**

69. Plaintiff Willie Jiles restates and realleges paragraphs 1 through 52 as paragraph 69 of this Count IV.

70. By virtue of the foregoing, Durham Transportation has retaliated against Plaintiff Jiles because he supported Jerrold Goldberg and other Caucasian co-workers in their efforts to redress racial discrimination and filed a charge of discrimination or otherwise participated in a complaint process in an effort to protect his rights under Title VII of the Civil Rights Act of 1964 as amended, and participated in an investigation, proceeding or hearing under Title VII of the Civil Rights Act of 1964, as amended in violation of that act.

71. As a result of this violation Plaintiff Jiles has suffered emotional distress, humiliation, degradation, loss of income and other damages of both a pecuniary and non-pecuniary nature.

72. The actions of Defendant Durham Transportation in retaliating against Plaintiff Jiles were taken with malice or with reckless disregard of Plaintiff's rights warranting the imposition of punitive damages.

WHEREFORE, Plaintiff, Willie Jiles, respectfully requests that this Honorable Court enter judgment in his favor and against Defendant Durham Transportation for compensatory damages in an amount to be determined at trial, for punitive damages in an amount to be determined at trial, and for such other and further relief as this Court deems just and equitable.

**Count VI**

**Plaintiff Glenn Gentile's  
Demand for Relief for Retaliation in Violation of  
§ 704(a) of Title VII of the Civil Rights Act of 1964  
Against Defendant Durham Transportation Services**

73. Plaintiff Glenn Gentile restates and realleges paragraphs 1 through 52 as paragraph 73 of this Count IV.

74. By virtue of the foregoing, Durham Transportation has retaliated against Plaintiff Gentile because he supported Jerrold Goldberg and other Caucasian co-workers in their efforts to redress racial discrimination and filed a charge of discrimination or otherwise participated in a complaint process in an effort to protect his rights under Title VII of the Civil Rights Act of 1964 as amended, and participated in an investigation, proceeding or hearing under Title VII of the Civil Rights Act of 1964, as amended in violation of that act.


75. As a result of this violation Plaintiff Gentile has suffered emotional distress, humiliation, degradation, lost of his employment with Defendant Durham Transportation and other damages of both a pecuniary and non-pecuniary nature.

76. The actions of Defendant Durham Transportation in retaliating against Plaintiff Gentile were taken with malice or with reckless disregard of Plaintiff's rights warranting the imposition of punitive damages.

WHEREFORE, Plaintiff, Glen Gentile, respectfully requests that this Honorable Court enter judgment in his favor and against Defendant Durham Transportation for compensatory damages in an amount to be determined at trial, for punitive damages in an amount to be determined at trial, and for such other and further relief as this Court deems just and equitable.

**PLAINTIFFS DEMAND A TRIAL BY JURY**

Respectfully submitted,  
Jerrold Goldberg, Willie Jiles, and Glenn  
Gentile

By:   
One of their attorneys

Aaron B. Maduff  
Atty. No. 06226932  
Maduff & Maduff  
36 S. Wabash St.  
Suite 1415  
Chicago, Illinois 60603  
312/236-8877

*Cal #2*

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

U.S. DISTRICT COURT  
CLERK

FEB 15 PM 4:00 '02

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FEB 19 2002

**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.

<b>Plaintiff(s): Jerrold Goldberg, Glenn Gentile, and Willie Jiles</b>		<b>Defendant(s): Durham Transportation, et al</b>	
County of Residence: Cook		County of Residence:	
Plaintiff's Atty:	Aaron B. Maduff Maduff & Maduff 36 S. Wabash, Suite 1415 (312)236-8877	Defendant's Atty:	

**02C 1125**

JUDGE JOAN H. LEFKOW

**MAGISTRATE JUDGE NOLAN**

<u>II. Basis of Jurisdiction:</u>	<b>3. Federal Question (U.S. not a party)</b>
<u>III. Citizenship of Principle Parties (Diversity Cases Only)</u>	
Plaintiff:-	N/A
Defendant:-	N/A
<u>IV. Origin :</u>	<b>1. Original Proceeding</b>
<u>V. Nature of Suit:</u>	<b>Employment Discrimination - 442</b>
<u>VI. Cause of Action:</u>	<b>28 U.S.C § 2000E</b>
<u>VII. Requested in Complaint</u>	
Class Action:	No
Dollar Demand:	To Be Determined
Jury Demand:	Yes

*1-2*

VIII. This case **IS NOT** a refile of a previously dismissed case.

Signature: Aaron Z. Madoff  
Date: 2/15/02

If any of this information is incorrect, please go back to the Civil Cover Sheet Input form using the *Back* button in your browser and change it. Once correct, print this form, sign and date it and submit it with your new civil action. **Note: You may need to adjust the font size in your browser display to make the form print properly.** Revised: 06/28/00

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

Eastern Division

In the Matter of

Jerrold Goldberg, Glenn Gentile, and Willie Jiles

v.

Durham Transportation, et al

Case Number:

**02C 1125**

U.S. DISTRICT COURT  
CLERK  
DOCKETED  
FEB 19 2002  
FILED-EDS  
02 FEB 15 PM 4:08

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:

Jerrold Goldberg, Glenn Gentile, and Willie Jiles

JUDGE JOAN H. LEFKOW

**MAGISTRATE JUDGE NOLAN**

(A)	(B)
SIGNATURE <i>Aaron B. Maduff</i>	SIGNATURE <i>Deanne S. Medina</i>
NAME Aaron B. Maduff	NAME Deanne S. Medina
FIRM Maduff & Maduff	FIRM Maduff & Maduff
STREET ADDRESS 36 South Wabash, Suite 1415	STREET ADDRESS 36 South Wabash, Suite 1415
CITY/STATE/ZIP Chicago, Illinois 60603	CITY/STATE/ZIP Chicago, Illinois 60603
TELEPHONE NUMBER (312) 236-8877	TELEPHONE NUMBER (312) 236-8877
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 6226932	IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 6273485
MEMBER OF TRIAL BAR? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input checked="" 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	TELEPHONE NUMBER
IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)	IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE)
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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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