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12 U.S. EQUAL EMPLOYMENT
13 OPPORTUNITY COMMISSION

FILED
Clerk
District Court

MAR 18 2009

For The Northern Mariana Islands
By _____
(Deputy Clerk)

14 IN THE UNITED STATES DISTRICT COURT
15 FOR THE NORTHERN MARIANA ISLANDS

16 U.S. EQUAL EMPLOYMENT
17 OPPORTUNITY COMMISSION,

18 Plaintiff,

19 vs.

20 L&T INTERNATIONAL
21 CORPORATION; L&T GROUP OF
22 COMPANIES, LTD; and DOES 1-10
23 inclusive.

24 Defendant(s).

Case No.: CV-06-0031

ARM
~~PROPOSED~~ ORDER RE:
SETTLEMENT

Hon. Alex R. Munson

25 On March 4, 2009, Plaintiff U.S. Equal Employment Opportunity
26 Commission ("Commission") represented by Gregory L. McClinton and
27 Defendants L&T International Corporation, L&T Group of Companies, Tan
28 Holdings Corporation, Tan Overseas Incorporated, Concorde Garment
Manufacturing Corporation, Seasonal Incorporated and Micro Pacific, Inc.,
("Defendants") represented by Steven P. Pixley and Colin M. Thompson appeared
before this Court for the Pretrial Conference and Final Settlement Conference. The
Parties reached agreement to resolve the litigation by entry of a Consent Decree.

1 The Defendant(s) will pay \$210,890 in monetary damages and have agreed in
2 principal to a Consent Decree, the terms of which are to be determined. It is
3 further agreed that the Court will determine which named defendant or defendants
4 will be bound by the Consent Decree. The Parties are to submit briefs to the Court
5 on this issue not later than March 20, 2009. The Parties agree that the Courts
6 decision is final. The briefs shall be limited to 15 pages not including exhibits.
7 The final consent decree shall be submitted for approval to the Court by April 3,
8 2009.

9 Respectfully Submitted By:

10 U.S. EQUAL EMPLOYMENT
11 OPPORTUNITY COMMISSION
12 Anna Y. Park
13 Gregory L. McClinton
14 Thomas S. Lepak

15 Date: March 11, 2009

16 /s/ Gregory L. McClinton
17 Gregory L. McClinton
18 Senior Trial Attorney
19 Attorneys for Plaintiff

20 Date: March 11, 2009

21 THOMPSON LAW OFFICE LLC

22 /s/ Colin M. Thompson
23 Colin M. Thompson

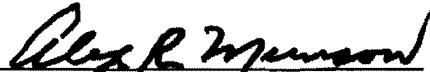
24 Date: March 11, 2009

25 Steven P. Pixley, Esquire

26 /s/ Steven P. Pixley
27 Steven P. Pixley
28 Attorney at Law

IT IS SO ORDERED:

Date: March 19, 2009


Hon. Alex R. Munson
U.S. District Court Judge

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DECLARATION OF MAILING

I am, and was at the time the herein mentioned delivery took place, a citizen of the United States, over the age of eighteen (18) years and not a party to the above-entitled cause.

I am employed in the Legal Unit of the Honolulu Local Office of the United States Equal Employment Opportunity Commission, Honolulu, Hawaii.

My business address is Equal Employment Opportunity Commission, 300 Ala Moana Boulevard, Room 7-127, Honolulu, Hawaii 96850

On the date that this declaration was executed, as shown below, I served the foregoing Proposed Order Re: Settlement via E-mail and FAX at Honolulu, State of Hawaii, in envelopes addressed as follows:

Mr. Colin M. Thompson, Esquire
THOMPSON LAW OFFICES LLC
J.E. Tenorio Building
PMB 917 Box 10001
Saipan, Mariana Islands, 96950
Colin.thompson@saipan.com

Mr. Steven P. Pixley, Esquire
2nd Floor, CIC Centre
Garapan, Beach Road
Saipan, Mariana Islands 96950
sppixley@aol.com

I declare under penalty of perjury that the foregoing is true and correct.
Executed on March 13, 2009 at Honolulu, Hawaii

_____/s/_____
Gregory L. McClinton