

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

THE DEPARTMENT OF FAIR EMPLOYMENT )  
AND HOUSING, )  
Plaintiff, )

v. )

LAW SCHOOL ADMISSION COUNCIL, INC., )  
Defendant. )

No. CV 12-1830-EMC

THE UNITED STATES OF AMERICA, )  
Plaintiff-Intervenor, )

v. )

LAW SCHOOL ADMISSION COUNCIL, INC. )  
Defendant. )

**JOINT MOTION FOR ENTRY  
OF CONSENT DECREE,  
INCLUDING PERMANENT  
INJUNCTION<sup>1</sup>**

ANDREW QUAN, NICHOLAS JONES, and )  
ELIZABETH HENNESSEY-SEVERSON, )  
Plaintiff-Intervenors, )

v. )

LAW SCHOOL ADMISSION COUNCIL, INC. )  
Defendant. )

<sup>1</sup> This Joint Motion for Entry of Consent Decree, Including Permanent Injunction, is submitted jointly by all the parties to this action. Pursuant to Civ. LR 3-4(a), a complete list of the parties is contained on the signature page of this document.

1 Plaintiff Department of Fair Employment and Housing, Plaintiff-Intervenor the United  
2 States of America, Plaintiff-Intervenors Andrew Quan, Nicholas Jones, Elizabeth Hennessey-  
3 Severson, and Defendant Law School Admission Council, Inc. (“LSAC”) (collectively “the  
4 Parties”), have resolved all issues in this litigation by Consent Decree, attached as Exhibit A, and  
5 memorialized by signatures at pages 41-44. In light of the agreement, the Parties respectfully  
6 request consideration and approval of the attached Consent Decree, entry of the Proposed Order  
7 and Permanent Injunction (included at the end of the Consent Decree at page 45), and upon  
8 entry, dismissal of this case with prejudice. A proposed Order is attached.  
9

10 DATED: May 20, 2014

Respectfully submitted,

11  
12 **FOR THE CALIFORNIA**  
13 **DEPARTMENT OF FAIR**  
14 **EMPLOYMENT AND HOUSING:**

**FOR THE UNITED STATES**  
**OF AMERICA:**

14 PHYLLIS W. CHENG  
15 Director

JOCELYN SAMUELS  
Acting Assistant Attorney General  
Civil Rights Division

16 JON ICHINAGA  
17 Chief Counsel

EVE L. HILL  
Deputy Assistant Attorney General  
Civil Rights Division

REBECCA B. BOND  
Chief  
ROBERTA KIRKENDALL  
Special Legal Counsel  
KATHLEEN P. WOLFE  
Special Litigation Counsel  
Disability Rights Section  
Civil Rights Division

24 /s/ Mari Mayeda  
25 MARI MAYEDA  
26 PHOEBE LIU  
27 JULIA MONTGOMERY  
28 JONI CARRASCO  
SAMI HASAN  
IRINA TRASOVAN  
Attorneys

/s/ Nabina Sinha  
NABINA SINHA  
MEGAN E. SCHULLER  
Attorneys  
Disability Rights Section  
Civil Rights Division  
U.S. Department of Justice  
950 Pennsylvania Avenue, N.W. – NYA  
Washington, DC 20530

1 Department of Fair  
2 Employment and Housing  
2218 Kausen Drive, Suite 100  
3 Elk Grove, CA 95758

Telephone: (202) 307-0663  
Facsimile: (202) 305-9775  
Nabina.Sinha@usdoj.gov

4 **FOR THE UNITED STATES**  
5 **OF AMERICA, CONTINUED:**

6 MELINDA HAAG  
United States Attorney  
Northern District of California

8 ALEX G. TSE  
Assistant United States Attorney  
Chief, Civil Division

10 /s/ Melanie L. Proctor  
11 MELANIE L. PROCTOR<sup>2</sup>  
Assistant U.S. Attorney  
12 United States Attorney's Office  
Northern District of California  
13 450 Golden Gate Avenue  
14 San Francisco, CA 94102  
Telephone: (415) 436-6730  
15 Facsimile: (415) 436-6748  
Melanie.Proctor@usdoj.gov

17 **FOR THE LAW SCHOOL**  
18 **ADMISSION COUNCIL, INC.:**

19 /s/ Robert Burgoyne  
ROBERT A. BURGOYNE  
20 CAROLINE MEW  
Fulbright & Jaworski LLP  
21 801 Pennsylvania Avenue, N.W.  
22 Washington, DC 20004

**FOR ANDREW QUAN, NICHOLAS**  
**JONES, AND ELIZABETH**  
**HENNESSEY-SEVERSON:**

/s/ Jinny Kim  
JINNY KIM  
The Legal Aid Society – Employment Law Center  
180 Montgomery Street, Suite 600  
San Francisco, CA 94104

28 \_\_\_\_\_  
<sup>2</sup> I, Melanie L. Proctor, hereby attest that I gained the concurrence of all signatories whose signatures are represented by /s/ in the filing of this document.

1 **[PROPOSED] ORDER GRANTING JOINT MOTION FOR ENTRY OF CONSENT**  
2 **DECREE, INCLUDING PERMANENT INJUNCTION**

3 The Court has before it the Joint Motion for Entry of Consent Decree, Including  
4 Permanent Injunction. Upon consideration of the terms of the Consent Decree, and in light of  
5 the agreement of the parties, it is this \_\_\_ day of \_\_\_\_\_ 2014 hereby ORDERED that:  
6

7 The Joint Motion for Entry of Consent Decree is GRANTED;

8 The clerk shall enter the Order and Permanent Injunction as a separate docket entry;

9 The clerk shall enter the signed Consent Decree as a separate docket entry;

10 The court shall retain jurisdiction over the Consent Decree; and

11 Accordingly, this case shall be dismissed with prejudice.  
12  
13  
14

15 \_\_\_\_\_  
16 EDWARD M. CHEN  
17 United States District Judge  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28