

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,)	
Plaintiff,)	
)	
vs.)	Civil Action No. CV-75-S-0666-S
)	
JEFFERSON COUNTY, ALABAMA, et al.,)	
Defendants.)	
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JOHN W. MARTIN, et al.,)	
Plaintiffs,)	
)	
vs.)	Civil Action No. CV-74-S-0017-S
)	
CITY OF BIRMINGHAM, ALABAMA, et al.,)	
Defendants.)	

MODIFIED JEFFERSON COUNTY CONSENT DECREE

Nearly four decades ago, the plaintiffs in these consolidated actions filed complaints against Jefferson County, Alabama, and others to enforce the provisions of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e *et seq.*, as amended by the Equal Employment Opportunity Act of 1972, Pub L. 92-261, 86 Stat. 103, the State and Local Fiscal Assistance Act of 1972, as amended, 31 U.S.C. § 1221 *et seq.*, the Omnibus Crime Control and Safe Streets Act of 1968, as amended, 18 U.S.C. § 2510 *et seq.*, 42 U.S.C. § 1981, 42 U.S.C. § 1983, and the Fourteenth Amendment to the United States Constitution. The plaintiffs alleged that Jefferson County and other defendants had engaged in a pattern or practice of discrimination based on race and sex with respect to recruitment, hiring, assignment, promotion, discipline, and other terms and conditions of employment. Jefferson County denied the allegations.

Nevertheless, on December 28 and 29, 1982, representatives of the plaintiffs, Jefferson County, and the Sheriff of Jefferson County executed a consent decree.¹ In doing so, Jefferson County and the Sheriff: expressed their desire to “avoid the burdens and expense of any further litigation in these consolidated actions”; pledged their commitment to ensuring that “any disadvantages to blacks and women that may have resulted from any past discrimination against them are remedied so that equal employment opportunities will be provided to all”; and, affirmed their acceptance of the terms of the agreement “as final and binding among the parties signatory hereto as to the issues resolved herein.”² The consent decree was ratified and approved by Judge Sam C. Pointer, Jr., and entered on December 29, 1982.

Twenty-five years later, the Martin class of plaintiffs and Bryant class of plaintiff-intervenors (“the Martin-Bryant parties”) filed a motion asking this court to hold Jefferson County in contempt for failing to comply with the requirements of its

¹ The persons who executed the consent decree on behalf of the defendants were Ben L. Erdreich, Ray Moore, and Chriss H. Doss, acting in their official capacities as the duly-elected Commissioners of Jefferson County, Alabama (a subdivision of the State of Alabama which then was governed by only three Commissioners), and Melvin L. Bailey, acting in his official capacity as the Sheriff of Jefferson County, Alabama.

² Doc. no. 1832 (Dec. 29, 1982 Consent Decree), at 31. The parties also waived any findings of fact and conclusions of law on all outstanding issues, except for the amount of any fees and costs due to be paid to the attorneys representing the private plaintiffs in the consolidated actions. As to those issues, the parties stated their intention to seek agreement without the necessity for court intervention, but stipulated that, in the event agreement could not be reached, the unresolved issues would be submitted to the court for determination. The United States waived any entitlement it might have to recover costs.

consent decree, and seeking a modification of some provisions of that decree.³ The County was ordered to respond to the motion, and to show cause why it should not be held in contempt, and why its decree should not be modified.⁴

Following extensive discovery and bench trials in 2009 and 2012 on the issues raised by the Martin-Bryant parties' motion, this court entered a Memorandum Opinion and Order on August 20, 2013, adjudging Jefferson County to be in civil contempt for failing to comply with the requirements of its Consent Decree, and finding that the remedy of appointing a Receiver to direct, control, operate, manage, and administer all employment decisions by the County was warranted.⁵ Among other things, the parties were ordered to: confer regarding the modifications that should be made to the County's 1982 consent decree, in the light of the evidence presented at trial and the findings made in this court's opinion; to file a joint report of their conference on or before Friday, September 20, 2013; and, to appear for a status conference commencing on September 26, 2013.⁶ Prior to that conference, this court received an electronic mail (Email) transmission from one of the attorneys for the Martin-Bryant parties representing that all parties had reached agreement on

³ See doc. no. 1413 (Martin-Bryant Parties' Motion to Hold Defendant Jefferson County in Civil Contempt and Modify Jefferson County Consent Decree).

⁴ See doc. no. 1458 (Show Cause Order).

⁵ See doc. no. 1824 (Memorandum Opinion and Order), at 144-45.

⁶ *Id.* at 146-47.

modifications that should be made to the December 29, 1982 Consent Decree, and attached a copy of the proposed modifications.

Now, therefore, based upon the representations of counsel for the United States, the Martin-Bryant parties, Jefferson County, and the Sheriff of Jefferson County, together with the evidentiary proceedings and discovery filed in connection with the Martin-Bryant parties' motion to hold Jefferson County in civil contempt, it is ORDERED, ADJUDGED, and DECREED that the Consent Decree entered in these consolidated proceedings on December 29, 1982 be, and the same hereby is, modified to read as follows:

I. GENERAL INJUNCTIVE PROVISIONS

1. The defendant Jefferson County, and the Jefferson County Sheriff, their officials, agents, employees, and any other persons who participate in the hiring, firing, promotion or discharge of employees or applicants for employment with the County (hereinafter collectively referred to as "the County" or "the defendant Jefferson County") are permanently enjoined and restrained from engaging in any act or practice which has the purpose or effect of unlawfully discriminating against any employee of, or any applicant or prospective applicant with, Jefferson County because of such individual's race, color or sex. The defendants have agreed that all hiring, promotion, upgrading, training, job assignments, discharge or other

disciplinary measures, compensation, or other terms and conditions or privileges of employment shall be maintained and conducted in a manner which does not unlawfully discriminate on the basis of race, color or sex. Further, the County shall not retaliate against or in any way take action against any person because that person opposes or has opposed alleged discriminatory policies or practices in Jefferson County, or because of that person's participation in or cooperation with the investigation and trial of these actions, or in any proceedings therein.

2. Nothing herein shall be interpreted as requiring the County to hire unnecessary personnel, or to hire, transfer, or promote a person who is not qualified, or to hire, transfer or promote a less qualified person, in preference to a person who is better qualified based upon the results of a job related selection procedure. Nothing herein shall prohibit the County from discharging, disciplining or demoting employees for just cause in accordance with applicable law, nor shall it preclude the County from engaging in layoffs or rollbacks of employees pursuant to State law, provided, however, that any such actions are taken and executed without regard to race or sex.

3. Remedial actions and practices required by the terms, or permitted to effectuate and carry out the purposes, of this Consent Decree shall not be deemed discriminatory within the meaning of paragraph 1 above or the provisions of 42

U.S.C. § 2000e-2(h), (j), and the parties hereto agree that they shall individually and jointly defend the lawfulness of such remedial measures in the event of challenge by any other party to this litigation or by any other person or party who may seek to challenge such remedial measures through intervention or collateral attack. If any collateral lawsuit involving this Consent Decree arises in state court, then the County shall notify counsel for the plaintiffs and remove such action to the United States District Court.

4. In the event plaintiffs seek to enforce any provision of this Decree, they shall provide notice of their intentions to: County Attorney, Jefferson County, 716 Richard Arrington Blvd. North, Room 280, Birmingham, Alabama 35203. Such notice shall state, with reasonable particularity, the nature of the alleged violation and the relief sought. The parties shall have a period of thirty (30) days within which to resolve the matter informally. If the parties fail to resolve the matter plaintiffs may, upon expiration of the thirty-day period, apply to the Court for an appropriate enforcement order.

II. SPECIFIC INJUNCTIVE PROVISIONS

A. Accelerated Recruitment and Certification Procedures

5. One of the major purposes of this Decree is to ensure that blacks and women are considered for employment by the County on an equal basis with whites

and males and to correct for the effects of any alleged prior discriminatory employment practices by the County against blacks and women. In particular, the County shall seek in good faith to achieve the employment of qualified blacks and females in job vacancies in the classified service of the County in numbers approximating their percentage representation among persons on the eligibility lists for such jobs as determined by the Jefferson County Personnel Board, and in job vacancies in laborer positions in the unclassified service in numbers approximating their percentage representation among qualified applicants for such jobs as determined by the County under the provisions of this Consent Decree. It is recognized that the process of increasing the number of qualified black and female applicants for these jobs is facilitated by a process free of unlawful barriers to their entry, by a substantial increase in recruitment efforts directed toward blacks and women, and by the use of fair and nondiscriminatory selection criteria. The objectives of this Decree will be considered to be attained in entry level jobs when the percentage of qualified blacks and women employed by the County in each of the jobs identified in paragraph 9 and in Appendices "A" and "B" of this Decree approximates their respective percentages in the civilian labor force of Jefferson County as generally reflected by the most current Federal Census. For jobs that require a professional degree, license or certificate, and where it can be shown that

blacks and/or women hold such degrees, licenses or certificates in percentage terms which are lower than their respective percentage representations in the civilian labor force of Jefferson County, the parties agree that the attainment of the objectives of this Decree for such jobs shall be based upon the best available information as to the availability of qualified blacks and women for such jobs. If the parties are unable to agree upon the data to be used for this purpose, the parties reserve the right to petition the Court to resolve such disagreement. If the County fails to meet these objectives in a particular job or jobs, it shall have the burden of demonstrating that it made a good faith effort to achieve such objectives, and that it otherwise complied with the affirmative recruitment and nondiscriminatory selection requirements for such positions as set forth in Part II of this Decree.

6. [This paragraph intentionally omitted.]

7. [This paragraph intentionally omitted.]

8. [This paragraph intentionally omitted.]

9. The defendant Jefferson County will ensure that blacks and women are selected for appointment in the jobs identified below in a nondiscriminatory manner, as provided in paragraphs 1 and 2 above, from the group of applicants certified by the Personnel Board. It is the expectation of the defendant Jefferson County and the plaintiffs, that such nondiscriminatory hiring pursuant to this Decree will result in the

selection of qualified blacks and women for these jobs in numbers approximating their overall representations on the certification lists received from the Personnel Board for such positions.

Blacks: Accountant
Account Clerk
Auditor
Automotive Mechanic
Construction Equipment Operator
Engineering Aide
Heavy Equipment Operator
Labor Supervisor
Public Works Supervisor
Revenue Examiner
Secretary
Intermediate Clerk
Senior Clerk
Stenographer
Truck Driver
Waste Water Treatment Plant Operator

Women: Drafter
Engineering Aide
Engineering Drafter
Engineering Technician
Graduate Engineer
Deputy Sheriff
Revenue Examiner
Security Officer
Sr. Civil Engineer
Stores Clerk
Traffic Planning Technician

Absent unusual circumstances, compliance with the provisions of this paragraph will be assessed on a semiannual basis in accordance with the reporting provisions set forth in paragraph 52 below.

10. [This paragraph intentionally omitted.]

11. In order to carry out the purposes and intent of the January 10, 1977 remedial Order, the defendant Jefferson County will ensure that blacks are appointed to deputy sheriff positions in a nondiscriminatory manner as provided in paragraph 2 above from the group of applicants certified by the Personnel Board. It is the

expectation of the defendant Jefferson County and the plaintiffs that such nondiscriminatory hiring pursuant to this Decree will result in the selection of qualified black deputy sheriffs in numbers approximating their overall representation on the certification lists received from the Personnel Board. Compliance with this paragraph shall be assessed on a semi-annual basis in accordance with paragraphs 52 and 53 below.

12. Jefferson County also recognizes that blacks and women have not been hired into certain divisions and departments in the County in numbers reflective of their interest or potential interest in such employment. Those departments and divisions in which blacks have not been hired consistent with their expressed or potential interest in such employment are identified in “Appendix A” of this Decree. Those departments and divisions in which females have not been hired consistent with their expressed or potential interest in such employment are identified in “Appendix B” of this Decree.

13. In these departments and divisions, Jefferson County agrees that it will make a good faith recruitment effort, in accordance with its affirmative recruitment obligations under this Decree, to secure the number of black and female applicants in entry level (open competitive) jobs in those departments and divisions that is at least equivalent to the degrees of representation of blacks and women in the civilian

labor force of Jefferson County. The parties preserve the right to adjust these recruitment goals through agreement and subject to the approval of the Court, where it can be shown that a professional degree, license or certificate is required to perform the duties of any particular job or jobs and that blacks and/or women hold such degrees, licenses or certificates in percentage terms in the relevant labor market which are inconsistent with these goals. The relevant labor market for the jobs identified on Appendices "A" and "B" will be Jefferson County, unless the parties agree or the Court requires that for a particular job or jobs some other labor market be used that will better serve the purposes of this Decree. For purposes of this paragraph, entry level jobs are those listed in Appendices "A" and "B."

14. With respect to positions in the departments and divisions identified in Appendices "A" and "B" which in the past have been traditionally filled by promotion from lower classifications, the County shall seek to secure the number of qualified black and female applicants for promotion to those jobs that is at least equivalent to their percentage representation in the applicant pool from which such promotions are made. The County shall request that the Personnel Board issue open competitive job announcements for positions in any department if the parties to this Decree agree that such a request is necessary to increase the applicant pool of qualified blacks and females in such department. In the event of any disagreement

between the parties to this Decree on this matter, any such party may petition the court to resolve such disagreement.

15. With respect to appointments to future vacancies in the departments and divisions identified in Appendices “A” and “B,” the County will ensure that such appointments are made in a nondiscriminatory manner, as provided in paragraphs 1 and 2 above. It is the expectation of the defendant Jefferson County and the plaintiffs that such nondiscriminatory hiring pursuant to this Decree will result in the selection of qualified blacks and women in accordance with their overall representations in the relevant applicant pools as set forth in paragraphs 9, 11, 13 and 14 above.

16. Except for unclassified laborer positions over which the County has sole recruitment responsibility under this Decree, if the recruitment efforts of the Personnel Board fail to supply sufficient applicants for the County to meet the objectives of this Decree, the County shall institute an affirmative recruitment program designed to inform blacks and women of job opportunities with the County. This recruitment obligation is intended to supplement but not duplicate the recruitment efforts of the Personnel Board. The County’s recruitment activities shall be directed specifically at attracting qualified black and female applicants for the jobs identified in paragraphs 9 and 11, and in Appendices “A” and “B” of this Decree. The recruitment program may include but shall not be limited to maintaining contacts with

area high schools, technical and vocational schools, colleges, and organizations which have traditionally expressed an interest in providing minority and female applicants, or which indicate such interest in the future, and informing them of employment opportunities with the County. In addition, where appropriate, advertising of employment opportunities may be placed with or in advertising media primarily directed to black and female audiences for the purpose of emphasizing to blacks and women the availability of employment opportunities with the County. Utilization of the above described recruitment sources in accordance with this paragraph shall constitute compliance by the County with the affirmative recruitment obligations required by this paragraph.

17. Subject to paragraph 2 and all other provisions of this Consent Decree, the County agrees to take appropriate and sufficient action to meet the employment expectations of the parties as set forth in paragraphs 9, 11, 13, 14 and 15 of this Decree.

B. Job Posting

18. The County shall inform its employees of all opportunities for promotion or transfer. The County shall ensure that all written announcements received from the Personnel Board for hiring, promotion and training opportunities with the County are made available to all of its employees reasonably in advance of any scheduled

examinations or training for such positions. Such announcements shall be posted in conspicuous places so that reasonable notice is given to the County's employees of such employment opportunities. Notices of job announcements within a department in either permanent, part-time or temporary positions shall be posted separately and in conspicuous places from notices of job announcements in other departments.

C. Sex Restrictions in Job Announcements and Certifications

19. Except for the position of Juvenile Detention Officer at the Jefferson County Family Court, the County shall not request that the Personnel Board restrict any job announcements or certifications on the basis of sex except where, pursuant to a proper validation study, gender is determined to constitute a bona fide occupational qualification within the meaning of Section 703(e) of Title VII for the job(s) listed in such announcements or certifications, and such determination is approved in writing by the United States. If such approval is not granted, the County reserves the right upon proper motion to petition the court for approval of the determination. The County may establish in consultation with the Personnel Board a special medical examination to be given to applicants for nurses aide and laundry worker positions. Such examination shall be used solely to determine whether applicants for such positions are physically qualified to perform the duties of those jobs, and it shall not be used to discriminate in purpose or effect against female

applicants.

D. Height-Weight Requirements

20. The County shall not use or follow any minimum height or weight requirements that have an adverse impact against blacks or women as selection criteria for any position, nor shall it abide by any such requirements if they are instituted and administered by the Personnel Board.

E. Eligibility to Apply for Promotion to Certain Jobs

21. The County shall not require deputy sheriffs to serve more than three years uninterrupted service in rank (or two years uninterrupted service in rank for candidates who have two years of college credits) in order to be eligible to take the promotional examination for sheriff sergeant, nor shall it require sheriff sergeants to serve more than two years uninterrupted service in rank in order to be eligible to take the promotional examination for sheriff lieutenant. Employees who have obtained permanent status as sheriff lieutenant shall not be deemed ineligible for promotion to the next higher rank based upon any minimum length of service or time in rank. The term “uninterrupted service” shall include any time spent as a probationary employee.

22. [This paragraph intentionally omitted.]

23. [This paragraph intentionally omitted.]

24. [This paragraph intentionally omitted.]

25. [This paragraph intentionally omitted.]

F. [This section intentionally omitted.]

26. [This paragraph intentionally omitted.]

27. [This paragraph intentionally omitted.]

G. Background Investigations

28. Background investigations shall be utilized in such a manner so as not unlawfully to discriminate on the basis of race or sex.

29. The Sheriff shall establish a written policy concerning background investigations within the Sheriff's Department within 90 days after this Decree is entered. As part of that policy, the Sheriff's Department shall provide applicants who have been rejected on the basis of the background investigation written notice of the specific reason(s) for their rejection. Such notice shall not require the Sheriff to disclose the identity of any person or employer who supplies information to the Sheriff's Department in confidence during an applicant's background investigation and who requests in writing that such information be kept confidential. An applicant who has received such notice shall be allowed ten (10) days to respond in writing and to provide relevant information concerning the basis of rejection. The Sheriff shall ensure that such written response and relevant information is reviewed by an

individual(s) who did not participate in the applicant's initial background investigation, and that this review shall occur before the rejection becomes final. If the Sheriff needs to fill a vacancy in a deputy sheriff's position prior to the completion of a review of the applicant's background investigation as set forth in this paragraph, or as may occur pursuant to the provisions of paragraph 33(f) below, the Sheriff may fill such vacancy with another applicant. If, upon completion of such review the applicant is found otherwise qualified for a deputy sheriff position, he or she will be placed and appropriately ranked on the certification list for the first deputy sheriff vacancy that arises subsequent to the completion of that review. If the Sheriff determines that blacks or women are not being employed in deputy sheriff positions in accordance with the objectives of paragraphs 9 and 11 above, and that the background investigation for this job is a factor that is precluding the Sheriff from meeting such objectives, the Sheriff shall require that the Sheriff Department review its background investigation policy to ensure that it is administered in a nondiscriminatory manner. In this regard, the Sheriff shall seek to ensure that if, as a result of such review, it is determined that any component, aspect, or element of the background investigation process results in a disproportionate disqualification of blacks or women, that such component, aspect or element will either be eliminated or shown to be job related in accordance with the requirements of Title VII.

H. Dismissals of Deputy Sheriffs During Probationary Periods

30. The Sheriff agrees that prior to the dismissal of any deputy sheriff during his or her initial twelve-month probation period, it will notify any such person in writing of the specific reason(s) for such dismissal, and he or she shall be given an opportunity to respond in writing to the specific reason(s) for such dismissal. Such response shall be made within five (5) days of the issuance of the notice of dismissal, provided, however, that such period shall be extended upon reasonable request to responsible officials of the Sheriff's Department with respect to any matter pertaining to such dismissal. The Sheriff shall ensure that such person is fairly advised of his or her rights under this paragraph. Copies of any correspondence, notes, memoranda or recordings concerning any matters covered by this paragraph shall be retained by the Sheriff and shall be available for inspection by attorneys for the plaintiffs upon request.

I. Supervisory Instruction

31. The County shall inform supervisory personnel that the County shall not discriminate against or harass any employee or potential employee on the basis of race or sex. In addition, the County will instruct such personnel about their responsibilities as they relate to carrying out the provisions of this Decree. Supervisory personnel will be evaluated, in part, on the basis of their compliance with

these instructions as well as their cooperation with the Affirmative Action Officer identified in paragraph 33 below.

J. Facilities

32. Jefferson County hereby agrees to ensure that all bathroom, locker, and similar facilities are available for use by County employees without regard to race.

K. Affirmative Action Officer

33. The County shall appoint an Affirmative Action Officer who shall have the following responsibilities:

- (a) Advise black and female employees of the terms of this decree;
- (b) Post his or her office hours and location and copies of this Decree in conspicuous places within each department or operational unit of the County;
- (c) Receive and investigate oral or written complaints of race and sex discrimination and conciliate such complaints when appropriate, and notwithstanding any other provisions of law, establish a written procedure which shall govern such complaints;
- (d) Meet periodically with department heads to assess their progress in meeting the objectives of this Decree;
- (e) Maintain a complete record of all actions taken in pursuit of the duties

prescribed herein, including all correspondence directed to or from the County with respect to any complaints or investigations undertaken pursuant to this Consent Decree and any investigatory files.

- (f) If, within any six-month reporting period prescribed by paragraphs 37 and 39 below, the County determines that it is failing to meet any of the objectives contained in Part II, subpart A of this Decree, the County shall require the Affirmative Action Officer to review the future selection decisions of the appointing authority in the job(s) and Department(s) in which such objectives were not met in order to ensure compliance with this Decree. As part of this review, the Affirmative Action Officer shall review the appointing authority's written justification for failure to select certified black or female applicants in the jobs for which the objectives of the Decree were not met, and shall submit his or her written comments together with the appointing authority's written justification to the County Attorney. Appointments may be made in the job(s) and Department(s) under review while such review is pending before the Affirmative Action Officer or the County Attorney, provided, however, that blacks or women who are found to have been improperly denied employment or consideration for

employment during the period covered by the review shall be eligible for recertification and employment in a future vacancy in the jobs to which they were originally certified, with all rights, benefits and compensation that they would otherwise be entitled to under the provisions of paragraphs 1 and 2 of this Decree.

- (g) The Affirmative Action Officer shall report at least semiannually to the County Commissioners and County Manager on his or her findings with respect to any investigations under-taken pursuant to his above described responsibilities.
- (h) The Affirmative Action Officer referred to herein shall be appointed by the County within thirty (30) days after final approval of this Decree. The County shall inform the plaintiffs of any changes in the identity of the Affirmative Action Officer.

III. INDIVIDUAL RELIEF

34. The County agrees to pay the sum of \$298,000 in full and complete settlement of the claims against the County for monetary relief in these consolidated actions. Any back pay awards to be made from such sum shall be subject to income tax withholding and the employee's share of Social Security. No individual monetary awards shall be made under this Decree until at least thirty (30) days after the date the

Court grants final approval to the Consent Decree. Within seven (7) days after provisional approval of the Consent Decree by the Court, or final approval of the Decree by the Court, whichever occurs first, the County agrees to pay the sum of \$298,000 to be deposited in separate trust accounts bearing interest at commercial rates as follows:

- (a) A fund in the total amount of \$10,000 shall be set aside for the individual private plaintiffs in the Martin action. Within ten (10) days after the date this decree is given final approval by the Court, the Clerk shall pay the following amounts to the following named plaintiffs, together with the interest accrued thereon. These amounts shall be in full satisfaction of all claims of the named plaintiffs against the County in these consolidated actions.

Eugene Thomas	\$2,500
Wanda Thomas	\$4,000
Ida McGruder	\$3,500

- (b) A fund in the total amount of \$69,696 for those women identified in “Appendix C” who were certified and not hired allegedly because of their sex in the jobs listed next to their names in that appendix.
- (c) A fund in the total amount of \$15,840 for those blacks identified in

“Appendix E” as subclass 1 who took the written test for the job of Deputy Sheriff that resulted in eligibility lists for that job in effect between April 25, 1975, and January 10, 1977 (the date of this Court’s Remedial Order referred to in paragraph 10 above), who have not been hired as Deputy Sheriffs, or who, subsequent to the entry of the Court’s January 10, 1977 Order, were hired by the County as Deputy Sheriffs, but who may have been hired earlier but for their rank on such eligibility lists.

- (d) A fund in the total amount of \$202,464 for those blacks identified in “Appendix F” as subclass 2 who were certified by the Jefferson County Personnel Board and not hired by the County to the jobs and departments during the time periods set forth in that appendix. This fund shall also be used to compensate those blacks identified in “Appendix D” who have individual claims of race discrimination in hiring but who are not members of subclass 2 as defined in “Appendix F.”

35. Except for those individuals described below, the amount of back pay relief, if any, to be awarded to the individuals identified in Appendices “C,” “D,” “E,” and “F” whose claims have yet to be reviewed by the plaintiffs shall be determined based upon the submission proof of claim forms in accordance with the provisions

of paragraph 37 below. Those blacks identified in “Appendix E” (the Deputy Sheriff test class) who have previously submitted proof of claim forms under the Consent Decree with the Jefferson County Personnel Board shall not be required to submit another proof of claim form to be eligible for back pay relief under this Decree.

36. The amounts allocated to each of the back pay funds described in Paragraph 34 above have been determined by a calculation of the relative economic injury suffered by each group or subclass described therein. The determinations of individual back pay awards for the members of the groups or subclasses described in Paragraphs 34(b), (c), and (d) will be made under the following general guidelines:

- (a) *Sex discrimination claims* (Paragraph 34(b)). Back pay will be determined for these claimants by counsel for the United States based on an evaluation of the merits of each individual claim. Factors that may be considered in making these determinations are the date the claimant was certified for the position, the number of claimants certified for a particular position, the pay rate for that job, and the claimant’s willingness or ability to have accepted an offer of employment in that job at the time(s) of certification.
- (b) *Race discrimination claims (testing)* (Paragraph 34(c)). All subclass members eligible for relief will share equally in the back pay allocated

to this subclass.

- (c) *Race discrimination claims (hiring)* (Paragraph 34(d)). Back pay will be determined for these claimants by counsel for the United States and the Martin plaintiffs based on an evaluation of the merits of the individual claim. The amount of back pay for a claimant may vary depending upon the date the claimant was certified for the position, the number of claimants certified for a particular position, the pay rate for the job, the claimant's willingness or ability to have accepted an offer of employment in that job at the time(s) of certification, and the number of additional vacancies in that job that plaintiffs allege would have been filled by blacks during the relevant time periods, absent alleged discrimination.

37. Within ten (10) days after the Court gives final approval to the Consent Decree, written notice will be given by the County by certified mail, return receipt requested, to each of the individuals identified in Appendices "C," "D," "E," and "F" who are required to submit proof of claim forms in order to be eligible for individual relief under this Decree. Notice to such individuals will be sent to their last known address. The form of the notice is attached as "Appendix G." Proof of claim forms (attached as Appendices "H" and "I") will be included with the notice to these

individuals, and they shall have sixty (60) days from the date of mailing to respond to their notice and to file their proof of claim forms with the Clerk of the Court.

38. Within ninety (90) days after receipt of all timely proof of claim forms by the Clerk of the Court, counsel for the plaintiffs will submit to the Court and counsel for the County a report identifying each person who, in their view, is entitled to participate in the individual relief provisions of this Consent Decree. In preparing this report, counsel for the plaintiffs shall be allowed access to the County's records and files after reasonable notice of no less than three (3) days, and any review of such records and files shall occur during normal working hours. Plaintiffs shall include a description of the job offer and remedial seniority, if any, to be offered by the County to such individual and the back pay relief, if any, to be afforded by the County to such person. In no event will the sum of the individual monetary awards to be paid by the County under this Decree exceed the sum of \$298,000, plus any interest accrued thereon.

39. Set forth in "Appendix L" is a listing of the jobs, Departments and number of job vacancies for which the individuals identified in Appendices "C," "D," and "F" will be eligible to present a claim for priority employment under the procedures set forth in paragraph 46 below. In no event will the number of remedial job offers to be made under part III of this Decree exceed the number of vacancies

identified in “Appendix L.”

40. The County shall have twenty (20) days from receipt of the plaintiffs’ report on individual relief to notify, in writing, counsel for the plaintiffs of any objections it may have to the job offer and/or seniority dates for the individuals identified in such report, except that such period may be extended for a reasonable period of time, not to exceed thirty (30) days, for good cause shown. If there are any such objections, the parties shall first attempt to reach a voluntary resolution of the objections. In the event the parties are unable to resolve such objections, they may petition the court to resolve them. The County agrees not to challenge any of the individual back pay awards to be made under this Consent Decree.

41. Remedial County seniority date, as that term is used in this Decree, shall mean the employee’s seniority for purposes of promotion, vacation as accrued, sick leave, and longevity pay, but such date shall not be utilized for pension purposes. Adjusted classification seniority, as that term is used in this Decree, shall mean the employee’s seniority for layoff and recall in the jobs to be offered to individuals under Part III of this Decree. In no event shall a remedial County seniority date or adjusted classification seniority date be earlier than March 24, 1972, the date Title VII was amended to include State, County and local governments.

42. Upon final determination by the parties of the awards of individual relief

to be made under this Decree, the County shall, within five (5) days thereafter, notify such persons by certified mail of their proposed awards of relief, if any, as set forth in the plaintiffs' report submitted to the Court. This notice shall also inform each of these individuals of their right to object to the relief, if any, as contained in the report, and that they must file their objections in writing with the Clerk of the Court within fifteen (15) days of their receipt of this notice.

43. If any such objections are filed, the Court shall thereafter, and as soon as practicable, schedule a hearing at which it will rule upon any objections to the report which have been timely filed. At the conclusion of such hearing, the Court shall determine whether to give final approval or disapproval to the awards of individual relief.

B. Implementation of Individual Relief

44. Immediately upon final approval by the Court of the awards of individual relief to be made under this Decree, the County will begin to implement Part III of this Decree as described herein.

45. Any person entitled to individual relief (including the named private plaintiffs), in order to obtain such relief, must sign a notarized release which will be provided that person by the County ("Appendix J") and return such notarized release to the County within thirty (30) days of that person's receipt thereof. Any such

individual who either does not sign such a notarized release or, alternatively, and absent good cause, does not return such signed notarized release to the County within thirty (30) days of that person's receipt thereof, shall be deemed to have waived his or her entitlement to such relief. Such release shall provide that the relief to which that person is entitled under Part III of this Decree, if accepted, shall be in full and final settlement of any and all claims against the County based upon allegations of race or sex discrimination occurring prior to the date such release is signed.

46. The County shall send a notice to each of the persons entitled to individual relief, informing them that the Court has given final approval of their right to such relief under this Decree. This notification shall be in writing, be made by certified mail, return receipt requested, and shall be approved as to substance and form by the plaintiffs prior to mailing. With respect to those individuals who are eligible for consideration to fill a future vacancy in a classified service position, the notice shall clearly and specifically inform such persons of the qualification requirements they will have to meet in order to be appointed to that position. Such notification also shall state that if the recipient has any questions about the notice, he or she may contact the Affirmative Action Officer, or counsel for the plaintiffs whose names, addresses and phone numbers shall be listed in the notice, or their own counsel.

47. As the County receives releases from the named private plaintiffs and individuals entitled to a back pay award under this Decree, it shall apply to the Court for Orders directing the Clerk of the Court to issue checks to such persons in the amount of his or her back pay award.

48. Each of the persons who are determined to be entitled to an offer of employment with the County pursuant to the plaintiffs' report as set forth in paragraph 38, shall be entitled to priority appointments to future vacancies in such positions in the order provided in plaintiffs' report. Such persons shall be required satisfactorily to demonstrate his or her qualifications for the job to be offered in accordance with the current qualification requirements for the job as established by the County and the Jefferson County Personnel Board, provided that such requirements are administered in a nondiscriminatory manner, do not unlawfully discriminate either in purpose or effect against blacks or women, and do not otherwise conflict with the provisions of paragraph 1 of this Decree. The County agrees to waive any age requirements which may currently bar any such individual from obtaining employment with the County if such individual met such age requirements at the time of original application as identified in the plaintiffs' report. These individuals shall also not be required to take any test administered by the Personnel Board for the job to be offered under this Decree if such individual took

and passed such test at the time of original application as identified in the plaintiffs' report.

IV. NOTICE AND FAIRNESS HEARING

49. Within ten (10) days after provisional approval of this Consent Decree by the Court, notice, in the form attached as "Appendix K," will be issued by publication in the Sunday edition of the *Birmingham News* for two consecutive weeks, and in the *Birmingham Times* on one weekday directed to all interested persons, informing them of the general provisions of this Decree and of their right to review a copy of the Decree, which will be on file with the Clerk of the Court. Within this same ten (10) day period, individual notice in the form attached as "Appendix K" will also be mailed by the County to each of the persons identified in Appendices "C" through "F." The cost of mailing and publication of any notices to be made under this decree shall be paid by the County. Both the notices by publication and the individual notices shall inform persons to whom such notices are directed of their right to be heard and to file objections, if any, to this Decree. Such objections must be filed with the Clerk of the Court by a date to be set by the Court in its Order granting provisional approval to this Decree. The Court shall thereafter, and on a date(s) to be fixed by the Court in its Order granting provisional approval to the Decree, schedule a fairness hearing at which those persons who file timely

objections to the Decree will be heard. At the close of such hearing, or as soon as practicable thereafter, the Court shall rule upon such objections and grant final approval or disapproval to this Consent Decree. The Court shall, however, withhold final approval of the awards of individual relief to be made under this Decree until those individuals who are identified in the plaintiffs report on individual relief are notified of their individual awards, if any, and are afforded an opportunity to be heard and to file any objections they may have to those awards.

V. RECORD KEEPING

50. To the extent that records referred to herein are not retained by the Personnel Board, the County shall retain during the period of this Decree necessary records concerning the implementation of this Decree. These records shall be made available to the plaintiffs for inspection and copying upon written request.

51. The County's records shall include the following:

- (a)** A list of all organizations and schools which are contacted for recruitment purposes, showing the date that any notice of job opportunity was mailed to them, the title of the job and number of positions within that job to be filled from that notice, and the date through which applications would be received for the job. A summary or compilation of all other recruitment efforts aimed at minorities and

women shall also be maintained, together with the date and nature of the efforts and the names and job title of the County employees involved.

- (b) All written applications and related records for all persons seeking employment with the County, including applications for transfer or promotion within or among departments, for a period of at least five (5) years, which shall include identification by the County of the applicant by race and sex. Such record shall also contain a statement signed by the appropriate County official, setting forth the reasons why any applicant was found not to be qualified for the position(s) applied for.
- (c) With respect to any applicant who is certified for hire or promotion and who is not selected for the vacancy for which that applicant is certified, the County shall record in writing, signed by the appropriate County official, the reasons for the applicant's not being selected for that vacancy. Also, the County shall record and maintain any other written records or comments on an applicant for certification in accordance with paragraph 32(e) above.
- (d) All written communications between the County and applicants for employment, transfer and promotion.
- (e) All written communications between the County and employees

concerning discipline and discharge, as well as all written reports concerning these matters.

VI. REPORTING

52. On or before April 30, 1983 and thereafter semi-annually, the County shall ensure that reports are made to the plaintiffs in machine-readable form specified by plaintiffs, containing the following information:

- (a) A summary showing the total number of current employees by race and sex in each job classification for each department of the County in both the classified and unclassified service.
- (b) A list of all probational appointments for permanent full-time positions, by job classification and department, during the six-month reporting period indicating the race and sex of the persons hired or promoted.

53. On or before April 30, 1983 and thereafter annually, the County shall report to the plaintiffs the following information:

- (a) A list of all persons, by job classification, department, race and sex, to whom positions have been offered with an indication thereon of whether or not the position was accepted.
- (b) A list of all promotions to permanent full-time positions in the classified service, by job classification and department, during the twelve-month

reporting period indicating the race, sex, date of initial hire in the classified service and date of the promotion.

- (c) A breakdown of the applicant flow for employment with the County which indicates by race and sex the number of applicants for each department and job classification in the classified and unclassified service, and the number of applicants hired, rejected and pending for each job classification and department. Applicant hires shall be separately identified as to Comprehensive Employment Training Act (CETA) positions.
- (d) A summary report of the recruiting activities conducted by the County and the results of those activities.
- (e) A report of the County's implementation of the individual relief provisions of this Decree. This report shall include a statement of the monetary payments, if any, that have been made to individuals entitled to such relief. This report shall further identify each individual who has been offered a job with remedial seniority under this Decree, and whether the job offer was accepted or rejected. For any individual who was disqualified from an offer of employment under Part III of this decree, a specific statement of the reasons for disqualification shall be

included in this report.

- (f) A list of the sworn personnel terminated from the Sheriff's Department and of employees terminated from the Public Works and Building Services Departments, identifying each individual by race, sex, date of hire, date of termination, probational or permanent status, and rank. In addition, the report shall explain the reason or reasons for each individual why his or her employment was terminated.
- (g) Within thirty (30) days of establishment or revision, a copy of the written policy concerning background investigations required by paragraph 29.
- (h) It shall be the responsibility of the County to make best efforts to ensure the accuracy of all reports and to evaluate such reports for errors and inconsistencies periodically, but on a no less than semi-annual basis. The County shall be responsible for providing to plaintiffs the final disposition of all employment decisions, providing updated reports where necessary for those decisions pending at the time of the issuance of the reports.

VII. EFFECT OF COMPLIANCE

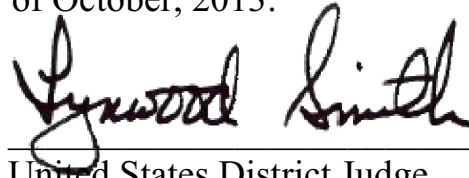
54. Compliance with the terms and conditions of this Consent Decree shall constitute compliance by the County with all obligations arising under Title VII of the Civil Rights Act of 1964, as amended; the State and Local Fiscal Assistance Act of 1972, as amended; the Omnibus Crime Control and Safe Streets Act of 1968, as amended, the Civil Rights Act of 1866 and 1871; 42 U.S.C. § 1981; 42 U.S.C. § 1983; and the Fourteenth Amendment to the Constitution of the United States as raised by the plaintiffs' complaints. Insofar as any of the provisions of this Consent Decree or any actions taken pursuant to such provisions may be inconsistent with any state or local civil service statute, law or regulation, the provisions of this Consent Decree shall prevail in accordance with the constitutional supremacy of federal substantive and remedial law.

VIII. RETENTION OF JURISDICTION

55. The Court retains jurisdiction of this action for such further relief or other orders as may be appropriate. At any time after six (6) years subsequent to the date of the entry of the Consent Decree, any party may move the Court upon forty-five (45) days notice to the others, to dissolve this Consent Decree. In considering whether the Consent Decree shall be dissolved, the Court will take into account whether the purposes of this Consent Decree have been substantially

achieved.

DONE and **ORDERED** this 16th day of October, 2013.

A handwritten signature in black ink, reading "Lynwood Smith". The signature is written in a cursive style with a large initial "L".

United States District Judge

APPENDIX A+

Group I – Administration and Planning

- Departments: (1) County Commission
(2) Budget Management
(3) Planning
(4) Risk Management
(5) Data Processing
(6) Printing
(7) Purchasing

Entry Level Jobs

Stenographer
Computer Operator
Programmer
Senior Programmer
Systems Analyst
Data Processing Supervisor
Data Operations Supervisor
Phototype Setter
Microphotographer
Assistant Print Shop Supervisor
Public Information Officer
Administrative Analyst
Statistician
Housing Rehabilitation Specialist
Architect
Planner

Land Acquisition Agent

Accountant

Personnel Officer

Principal Personnel Officer

Buyer

Principal Buyer

Purchasing Agent

Chief of Party

Group II – Finance and Information Technology

- Departments:
- (1) Comptroller (Accounting)
 - (2) Comptroller (Sewer Billing)
 - (3) Revenue
 - (4) Board of Equalization
 - (5) Tax Assessor
 - (6) Tax Collector
 - (7) Treasurer

Entry Level Jobs

Clerical Assistant

Stenographer

Database Administrator

Property Appraisal Assistant

Accountant

Chief Accountant

Principal Accountant

Comptroller

Auditor

Senior Auditor
Principal Auditor
Revenue Examiner
Tax Agent

+ Except for the jobs identified in paragraph 9 of the accompanying text, jobs in the departments identified in this Appendix or Appendix B that are not specifically identified as entry level jobs may be considered promotional jobs for purposes of this Consent Decree.

Group III – Courts

Departments: (1) Board of Registrars
(2) District Attorney -Birmingham
(3) District Attorney -Bessemer
(4) Probate Court

Entry Level Jobs

Legal Secretary
Stenographer
Court Reporter
Programmer
Mapper
Photo Camera Operator
Microphotographer
Accountant

Group IV – General Services

Departments: (1) General Services

Entry Level Jobs:

Telephone Operator
Stores Clerk

Voting Machine Mechanic
Locksmith
Carpenter
Plumber
HVAC/Refrigeration Technician
Electrician
Maintenance Repair Worker
Sr. Maintenance Repair Worker
Truck Driver
Automotive Technician
Painter
Labor Supervisor
Skilled Laborer
Security Officer
Building Maintenance Supervisor
Chief of Building Maintenance

Group V – Law Enforcement

Departments: (1) Sheriff
(2) Jails
(3) Coroner

Entry Level Jobs

Deputy Sheriff
Stenographer
Medical Secretary
Medical Transcriber
Public Safety Dispatcher

Truck Weight Inspector

Communications Service Clerk

Group VI – Public Works - Administration and Design

- Divisions:
- (1) General Administration
 - (2) Design
 - (3) Inspection Services
 - (4) Land Development
 - (5) Right of Way

Entry Level Jobs

Graduate Engineer

Sr. Civil Engineer

Engineering Aide

Sr. Engineering Aide

Engineering Inspector

Sr. Engineering Inspector

Drafter

Engineer Drafter

Mapper

Zoning Inspector

Computer Operator

Electrical Inspector

Plumbing Inspector

Gas Inspector

Building Inspector

Plans Examiner

GIS Manager

Public Works Supervisor

Group VII – Roads and Transportation

- Divisions:
- (1) Highway Maintenance and Construction
 - (2) Bessemer
 - (3) Ketona
 - (4) Shops
 - (5) Traffic
 - (6) Landfill

Entry Level Jobs

Clerk Typist
Intermediate Clerk
Stores Clerk
Senior Stores Clerk
Administrative Intern
Maintenance Mechanic
Auto Body Worker*
Automotive Mechanic
Carpenter
Engineering Aide
Truck Driver
Skilled Laborer
Service Station Attendant*
Equipment Service Worker*
Guard*
Shop Helper*
Auto Mechanic Helper*

Disposal Site Attendant*
Graduate Engineer
Senior Civil Engineer
Engineering Technician
Drafter
Traffic Planning Technician
Traffic Control Technician
County Traffic Engineer
Traffic Signal Maintenance Worker*
Traffic Striping Machine Operator*
Unclassified Laborer Positions
Construction Equipment Operator
Heavy Equipment Operator
Herbicide Applicator
Equipment Service Worker
Public Works Coordinator

*Jobs listed in this Appendix by an asterisk have in the past been filled by promotions of employees in lower rated jobs. If the County is unable to fulfill the affirmative recruitment objectives in these jobs as set forth in paragraph 13 of this Consent Decree, future vacancies in such positions will be announced on an open competitive basis as provided by paragraph 14 of the Consent Decree.

Group VIII – Environmental Services

- Divisions:
- (1) 8410
 - (2) 8420
 - (3) Sanitation/Sewer Plants
 - (4) Barton Laboratory

Entry Level Jobs

Clerk Typist

Intermediate Clerk

Graduate Engineer

Sewer Service Representative

Tap Machine Operator

Sewer Line – T.V. Equipment Technician

Waste Water Treatment Plant Operator

WWTP Shift Supervisor

WWTP Supervisor

Painter

Electrician

Engineering Aide

Truck Driver

WWTP Maintenance Worker

Sr. WWTP Maintenance Worker

Sewer Construction/Maintenance Supervisor

Environmental Lab Compliance Administrator

Environmental Biologist

Sewer Video Supervisor

Sewer Video Specialist

Sewer Service Inspector

APPENDIX B+

Group I – Administration, Information Technology and Finance

- Departments:
- (1) County Commission
 - (2) Revenue
 - (3) Board of Equalization
 - (4) Tax Collector
 - (5) Printing

Entry Level Jobs

Senior Administrative Intern
Public Information Officer
Auditor
Senior Auditor
Principal Auditor
Accountant
Chief Accountant
Revenue Examiner
Property Appraiser
Senior Property Appraiser
Senior Accountant
Tax Agent
Offset Printing Operator
Assistant Print Shop Supervisor
Buyer
Principal Buyer
Purchasing Agent
Land Acquisition Agent

Chief of Party

Database Administrator

Group II – General Services Department

Entry Level Jobs

Voting Machine Mechanic

Locksmith

Carpenter

Plumber

HVAC/Refrigeration Technician

Electrician

Painter

Maintenance Repair Worker

Sr. Maintenance Repair Worker

Automotive Technician

Truck Driver

Labor Supervisor

Skilled Laborer

Security Officer

Chief Security Officer

Building Maintenance Supervisor

Chief of Building Maintenance

Group III – Sheriff Department

Deputy Sheriff

Sheriff Sergeant

Entry Level Jobs

Deputy Sheriff

+ Except for the jobs identified in paragraph 9 of the accompanying text, jobs in the departments identified in this Appendix or Appendix A that are not specifically identified as entry level jobs may be considered promotional jobs for purposes of this Consent Decree.

Group IV – Public Works - Administration and Design

- Divisions:
- (1) General Administration
 - (2) Design
 - (3) Inspection Services
 - (4) Land Development
 - (5) Right of Way

Entry Level Jobs

Graduate Engineer
Engineering Technician Drafter
Traffic Planning Technician
Traffic Control Technician
County Traffic Engineer
Maintenance Mechanic
Automotive Mechanic
Carpenter
Engineering Aide
Sr. Engineering Aide
Engineering Inspector
Sr. Engineering Inspector
GIS Manager
Public Works Supervisor
Traffic Maintenance Worker
Truck Driver

Unclassified Laborer Positions

Group V – Roads and Transportation

- Divisions:
- (1) Highway Maintenance and Construction
 - (2) Bessemer
 - (3) Ketona
 - (4) Shops
 - (5) Traffic
 - (6) Landfill

Entry Level Jobs

Graduate Engineer
Engineering Technician
Drafter
Traffic Planning Technician
Traffic Control Technician
County Traffic Engineer
Maintenance Mechanic
Automotive Mechanic
Carpenter
Engineering Aide
Sr. Engineering Aide
Skilled Laborer*
Heavy Equipment Operator
Construction Equipment Operator
Herbicide Applicator
Equipment Service Worker
Public Works Coordinator

Unclassified Laborer Positions

* The job of Skilled Laborer has in the past been filled by promotion of employees in the unclassified service. If the County is unable to fulfill the affirmative recruitment objectives in this job as set forth in paragraph 13, future vacancies in such positions will be announced on an open competitive basis as provided by paragraph 14.

Group V – Environmental Services

- Divisions:
- (1) 8410
 - (2) 8420
 - (3) Sanitation/Sewer Plants
 - (4) Barton Laboratory

Entry Level Jobs

- Graduate Engineer
- Sewer Service Representative
- Tap Machine Operator
- Sewer Grout Specialist
- Sewer Line – T.V. Equipment Technician
- Waste Water Treatment Plant Operator
- WWTP Shift Supervisor
- WWTP Supervisor
- WWTP Maintenance Worker
- Sr. WWTP Maintenance Worker
- Painter
- Electrician
- Engineering Aide
- Skilled Laborer
- Sewer Construction/Maintenance Supervisor
- Sewer Services Supervisor

Environmental Lab Compliance Administrator

Environmental Biologist

Sewer Video Supervisor

Sewer Video Specialist

Sewer Service Inspector

Unclassified Laborer Positions

FEDERAL ENFORCEMENT SECTION

25-FEB-83

APPENDIX C

PAGE 1

Department	Job	Name	Date of Certification
BS	SR STORES CLK	SAREMI, REBECCA (HIGHT)	751112
CC	BAILIFF	SMITH, LONA	741227
CG	Sr Stores clk	Pilato, Virginia	1977
CH	STORES CLERK	ANDERSON, PATRICIA (BRAND)	741220
CH	STORES CLERK	MAHAFFEY, SHIRLEY	741220
CM	BAILIFF	ROBINSON, ELLEN	750130
CT	ACCOUNTANT	WHISENANT, LYNN	730724
DR	AUDITOR	EDWARDS, JEANNE D	740417
DR	REV EXAM	COYLE, MARY ANGELA	740717
DR	REV EXAM	SMITH, MARSHA	760702
DR	REV EXAM	WHITE, JANICE	730801
DR	REV EXAM	WILSON, HILDA	740717
PW	ENG AIDE	HAGLER, CAROLYN (SABE)	750807
PW	ENG AIDE	RIKARD, KARIAN	730618
PW	ENG AIDE	SULLIVAN, AUBREY	731004
PW	ENG AIDE	THOMAS, HELEN	740830
PW	ENG AIDE	TRAVIS, ANGELA (KIDD)	740819
PW	ENG AIDE	WHITSON, JEAN	730503

FEDERAL ENFORCEMENT SECTION

25-FEB-83

APPENDIX C

PAGE 2

Department	Job	Name	Date of Certification
PW	SEW PLT OPER	MCCULLERS, DORIS	730905
PW	SR. STORES CLK	SAREMI, REBECCA (HIGHT)	760420
PW	STORES CLERK	LOCKHART, MARIE	730207
PW	STORES CLERK	MAHAFFEY, SHIRLEY	760726
PW	STORES CLERK	PILATO, VIRGINIA	750103
PW	STORES CLERK	SMITH, JOHNNIE MAE	730213
PW	TRUCK DRIVER	DONALDSON, MARY	730728
PW	WTR POL INSP	HARDY, JUANITA	730618
PW	WTR POL INSP	JOHNSON, JULIA	740108
PW	WTR POL INSP	PRESCOTT, ANN (WOODWARD)	730618
PW	WTR POL INSP	RIETVELD, LESLIE	730510
PW	WTR POL INSP	SPEED, THELMA	730726
SD	DEP SHERIFF	ALLEN, SHERRY	751215
SD	DEP SHERIFF	AMICK, SHERRY	760120
SD	DEP SHERIFF	BASWELL, LYNN	750306
SD	DEP SHERIFF	BILLS, SANDRA	751017
SD	DEP SHERIFF	BODEN, LINDA	751017
SD	DEP SHERIFF	CANTRELL, VICKIE	760220
SD	DEP SHERIFF	COUCH, CAROLE	750918
SD	DEP SHERIFF	ELAM, BRENDA	750918
SD	DEP SHERIFF	HIBBLER, MARY	760220
SD	DEP SHERIFF	HILL, KATHY	760330
SD	DEP SHERIFF	IRVIN, MELBA	760220
SD	DEP SHERIFF	JAYNE, CHARLIE	751002
SD	DEP SHERIFF	LASSITER, SANDRA	760220
SD	DEP SHERIFF	MANN, JANICE	751017
SO	DEP SHERIFF	MCLAUGHLIN, CATHY	750306
SD	DEP SHERIFF	NORMAN, LINDA	760622
SD	DEP SHERIFF	TOMPKINS, BRENDA	760622
TC	TAX AGENT	JENNINGS, LORETTA	750117

FEDERAL ENFORCEMENT SECTION

25-FEB-83

APPENDIX C

PAGE 3

Department	Job	Name	Date of Certification
TC	TAX AGENT	TAYLOR, MAILYE	750130

APPENDIX D

Name	Department	Job	Claim	Date of Application or Certification
Alicia P. Andrews	Tax Collector	Int Clerk	race	1/9/76
Willie Austin	Tax Collector	Int Clerk	race	6/22/73
Mamie Bickerstaff				
(Stove)	Print	Int Clerk	race	1974
Josh Chappell	Public Works	Civil Eng	race	10/22/76
Naomi Davis	County Home	Head Cook	race	11/73
Amy DeLoach	County Home	Head Cook	race	11/73
Gordon Fears	Public Works	Water Pollution Insp.	race	8/3/73
Cleophus Evans	Public Works	Sewage Plant	race	1975
		Operator		
Viola Fritz	Criminal Court	Int Clerk	race	5/7/75
Vendetta Humphrey	Tax Assessor	Int Clerk	race	4/1/76
Mary LaVert	County Home	Head Cook	race	11/73
Jane Moore	Tax Assessor	Intermediate Clerk	race	1/28/75
Catherine Owens	County Home	Head Cook	race	11/73
Walter Pickett	Public Works	Watchman	race	2/28/72
Willie Sargent	Inspection Services	Building Inspector	race	
Moses Suggs	Building Services	Maintenance	race	3/28/72
		Repair Worker		
Deborah Terry	Sheriff	Communications	race	9/16/76
		Serv.		
Tyrone Tolbert	Public Works	Watchman	race	8/2/73
Mary F. Wilson	County Home	Head Cook	race	11/73

Appendix E

Subclass No. 1

This subclass consists of all black persons who took the written test for the job of Deputy Sheriff that resulted in eligibility lists for that job which were in effect between April 25, 1975 and January 10, 1977, who have not been hired as Deputy Sheriffs by the County, or who, subsequent to January 10, 1977, were hired as Deputy Sheriffs by the County but who may have been hired earlier in that job but for their rank on such eligibility lists.

The individuals identified below are members of this subclass who previously filed proof of claim forms under the Consent Decree with the Jefferson County Personnel Board and who indicated in their proof of claim forms that they were interested in employment with the County as Deputy Sheriffs. These individuals will not be required to submit another proof of claim form under this Decree in order to be eligible for back pay relief.

Addie, Harry

Allen, III, Lewis

Archie, Ruby E.

Austin, Frederick L.

Baldwin, Eugene

Bell, Joyce A.

Belle, Sr., Frank

Bennett, Clifford J.

Bettis, Berman Louis

Biffle, Crystal A.

Bolden, Catherine

Bonner, Jr., Lester

Bradford, James E.

Brewster, Joe Ann

Briggins, Anthony

Brownlee, Jr., Eddie F.

Cannon, Charles Edwin

Carlton, Laura

Carroll, Douglas

Cathey, Larry

Clark, James Edward

Coleman, Arthur William

Coleman, Cynthia D.

Coleman, Jesse J.

Coleman, Larry

Cotton, Mary A.

Courthers, Jr., Willie B.

Curtis, Kenneth R.

Davis, Kenneth A.

Davis, Michael E.

Desmond, Pearlie

Donald, James R.

Drish, Charles Andrew

Dukes, James

Dunning, Bosnaza Lee

Echols, Sammy L.

English, Dedrick C.

Escott, John C.

Eskridge, Dorothy

Evans, B. G.

Felder, Dan Winn

Fields, Anthony E.

Fields, Leon William

Ford, Vertie Lee

Forrest, Michael R.

Forte, Eldrick

Foster, Jr., Sammie Lee

Frazier, Johnny N.

Frazier, Robert

Freeman, Sallie E.

Fritz, Veola Parker

Gardner, Eddie Leroy

Gay, Jr., Chappell

Giles, Sherman I.

Gillespie, Jr., Homer

Graham, Joycelyn D.

Grayson, James Bernard

Green, Alma Elaine

Grider, Jessie K.

Grider, Willie Frank

Guest, Ernestine

Hall, Mrs. Carol A.

Hall, Tyrone Lee

Halloway, Delphine

Hampton, Mildred

Hardin, Bennie W.

Harper, Carl Joe

Harris, Gregory Peck

Hawkins, Curtis J.

Head, Rufus Fred

Hendrix, Clarice

Henley, Wardell

Henry, Rhonda Jean

Hicks, Frederick D.

Hill, Aaron

Hogan, Annie Mae

Holder, Michael James

Holmes, Gloria Jean

Holmes, Joslyn

Horne, Jr., Ira

Hoskin, Jr., Esaw

Houston, Ethel B.

Hudson, Benjamin F.

Hunter, Robert

Ikner, Anna Green

Jackson, Dwight

Jackson, Jr., Ira

Jackson, Jr., Thomas J.

Jefferson, Leon

Jefferson, Sylvester

Jenkins, Jr., Benjamin

Johnson, Berneeda

Johnson, Carl L.

Johnson, James L.

Jones, Calvin

Jones, III, Cleveland

Jones, Donald R.

Jones, Geraldine

Kelly, Jr., Thomas

Kendricks, Angelia B.

Kennon, Larry J.

Lambert, Daniel

Kyle, Thomas C.

Lanier, Walter Edwin

Leonard, Freddie

Lewis, Johnny Anthony

Lewis, Jerry

Lewis, Ludie D.

Lillie, James Darnell

Lockett, Charles E.

Martin, Matthew

Maze, Alfonzo

McBride, James I.

McCall, Charles E.

McClure, Rickey Lane

McDaniel, Brenda Joyce J.

McElroy, Linda Joyce

McGammon, Alberta G.

McLemore, Sandra F.

McMillian, Lucette Jackson

Merriweather, III, William

Miles, Randy Lynn

Mitchell, Darrin Lee O.

Mixon, Rose L.

Montgomery, Isaac L.

Moody, Gloria A.

Moore, Jr., Cliff

Moore, Jimmy

Moorer, Jerome

Murray, Rosa R.

Neuburn, David Edwards

Nichols, Freddie

Oliver, Harriet M.

Oliver, Milton

Parham, Terrace

Pasley, Curtis L.

Patton, Langford

Pearson, Gemetra

Perdue, Willie Hugh

Perkins, Joe L.

Perry, Latricia Ann

Pollard, Mary Alice (Kimbrough) (Spann)

Pritchett, Deloris Best

Rathliffe, Samuel J.

Reddock, Cornelius

Rogers, III, William

Roper, Pamelin G.

Russell, Jerome E.

Sanders, Cosby D.

Sanders, DeWayne E.

Scott, Jr., David W.

Sherrod, Otha R. N. Duffie

Simmons, Jr., Claude Henry

Smith, Jr., Douglas

Smith, Larry Jerome

Stephenson, Eugene

Stewart, Joseph R.

Stone, Jr., Richard

Stoudimire, Joe A.

Suttle (Hatcher), Eloise

Sutton, Eddie

Taylor, Larry

Thomas, Jimmie L.

Thomas, Jr., Nathan

Thomas, Robert L.

Thomas, Wanda Gayle

Thompson, Jr., Earlie

Tolbert, Wonzie Denise

Toney, Deborah A.

Townes, Bernice

Tyus, Jimmy

Vance, Lawrence

Vasser, Patricia Ann

Wallace, Oscar D.

Ward, Bob W.

Washington, Carl Jeffrey

Washington, Cornelius

Webb, Charles E.

Wedgeworth, Otis

Welch, Joe Nathan

Whitehead, II, Ned

Wilburn, Jr., Joseph Lee

Williams (Nation), Cynthia Ann

Williams, Deborah Joyce

Williams, Frankie M.

Williams, Gwendolyn

Williams, Herman James

Williams, James A.

Williams, James Frederick

Williams, Jr., Marshall

Williams, Sylvester James

Williams, Patricia A.

Wilson, Jr., Robert

Wilson, Willie

Young, Doris Jean

Youngblood, Gwendolyn

Appendix F**Subclass No. 2**

This subclass consists of all black persons who were certified by the Personnel Board and not hired by the County from certifications to the following jobs and departments, during the following periods of time:

	<u>Department</u>	<u>Job</u>	<u>Time Period</u>
a.	Board of Equalization (BE)	Clerk Typist Intermediate Clerk	March 24, 1972-December 31, 1976 March 24, 1972-December 31, 1976
b.	Building Services (BU)	Electrician Voting Machine Mechanic Watchman/Guard	March 24, 1972-December 31, 1976 March 24, 1972-December 31, 1976 March 24, 1972-December 31, 1976
c.	Circuit Court (CC)	Clerk Typist	March 24, 1972-December 31, 1976
d.	Criminal Court (CM)	Clerk Typist	March 24, 1972-December 31, 1976
e.	Data Processing (DP)	Keypunch Operator	March 24, 1972-December 31, 1976
f.	Public Works (PW)	Engineering Aide Clerk Typist Intermediate Clerk Intermediate Stenographer Stores Clerk Truck Driver Sewage Plant Operator Public Service Aide	March 24, 1972-December 31, 1976 March 24, 1972-December 31, 1976 March 24, 1972-December 31, 1976 March 24, 1972-December 31, 1976 March 24, 1972-December 31, 1976 March 24, 1972-December 31, 1976 March 24, 1972-December 31, 1976 March 24, 1972-December 31, 1976
g.	Revenue (DR)	Clerk Typist Intermediate Clerk Computer Operator Keypunch Operator	March 24, 1972-December 31, 1976 March 24, 1972-December 31, 1976 March 24, 1972-December 31, 1976 March 24, 1972-December 31, 1976
h.	Sheriff (SD)	Deputy Sheriff Intermediate Clerk Watchman Food Service Supervisor Stenographer	March 24, 1972-December 31, 1976 March 24, 1972-December 31, 1976 March 24, 1972-December 31, 1976 March 24, 1972-December 31, 1976 January 1, 1977-December 31, 1978

Attached hereto is a listing of the subclass members currently known to the plaintiffs.

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DEPARTMENT	JOB	NAME	DATE OF CERTIFICATION
BE	CLERK TYPIST	ARRINGTON MARY	730726
BE	CLERK TYPIST	BENSON BETTY JEAN	740129
BE	CLERK TYPIST	BLACKMON, DARLENE	720927
BE	CLERK TYPIST	BROWN IRA J.	740415
BE	CLERK TYPIST	CLARK DELOIS	730530
BE	CLERK TYPIST	COATS BARBARA	730830
BE	CLERK TYPIST	COLEMAN LINDA	720927
BE	CLERK TYPIST	DENSMORE MILDRED	750801
BE	CLERK TYPIST	DURR, CORDELIA	730521
BE	CLERK TYPIST	EASTE HENRIETTA S.	741002
BE	CLERK TYPIST	GEORGE MARY ANN	720627
BE	CLERK TYPIST	HILL EFFIE M.	740426
BE	CLERK TYPIST	HOLIFIELD, BEVERLY	740415
BE	CLERK TYPIST	JENKINS LINDA FAYE	740131
BE	CLERK TYPIST	JONES BRENDA	750508
BE	CLERK TYPIST	LAWSON DEBRA	750807
BE	CLERK TYPIST	LAWSON, DELORES	720925
BE	CLERK TYPIST	LEONARD, MAE D.	740510
BE	CLERK TYPIST	LOVE DAVEESA	741002
BE	CLERK TYPIST	MALLORY, CLARICE	730810
BE	CLERK TYPIST	MCCLAIN, ELAINE	760617
BE	CLERK TYPIST	PATTERSON JANET	750508
BE	CLERK TYPIST	PERDUE ANNIE	730726
BE	CLERK TYPIST	PICKETT, VELMA	750508
BE	CLERK TYPIST	SHORT ANNETTE	730525
BE	CLERK TYPIST	SILMON BETTY JEAN	740209
BE	CLERK TYPIST	SIMPSON EVELYN	740418
BE	CLERK TYPIST	WELCH HILDA	730517
BE	CLERK TYPIST	WHITE VERONICA A.	740510
BE	CLERK TYPIST	WILLIAMS GERALDINE	740617
BE	CLERK TYPIST	WILLIAMS, JO ANN	740129
BE	CLERK TYPIST	WILSON FLORENCE	740205
BE	CLERK TYPIST	WILSON, HELEN (MATTHEWS)	730720
BE	INTERM CLK	CARTER GWEN	750516
BE	INTERM CLK	FRITZ VEOLA	750516
BE	INTERM CLK	HENDERSON KATRINA	760616
BE	INTERM CLK	HIGGINS GWENDOLYN	750228
BE	INTERM CLK	HUMPHREY VENDETTA	760616
BE	INTERM CLK	MCCLURE DEBRA	760611
BU	ELECTRICIAN	JUDKINS, JAMES	730824

FEDERAL ENFORCEMENT SECTION
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 PAGE 2

DEPARTMENT	JOB	NAME	DATE OF CERTIFICATION
BU	ELECTRICIAN	SMITH, PAUL	740410
BU	VOT MACH MECH	JENNINGS, PERCY	740702
BU	VOT MACH MECH	SHOWVER. EUGENE	740626
BU	VOT MACH MECH	SMITH, PAUL	730601
BU	VOT MACH MECH	WARREN, CECIL	740702
BU	WATCHM/GUARD	CRUMP, JR FRANK	750110
BU	WATCHM/GUARD	DAVIS, WILLIE	740411
BU	WATCHM/GUARD	DOWTHARD, DWIGHT	750508
BU	WATCHM/GUARD	HARDAWAY, JR AMOS	750508
BU	WATCHM/GUARD	HARRIS, DOUGLAS	740329
BU	WATCHM/GUARD	HOUSTON, JR. TOM	730801
BU	WATCHM/GUARD	HUDSON, LOCHELLE	750124
BU	WATCHM/GUARD	JONES, WILLIAM T.	750226
BU	WATCHM/GUARD	TERRY, THOMAS	750110
BU	WATCHM/GUARD	TOLBERT, TYRONE	730730
CC	CLERK TYPIST	AGEE DEBRA GAIL	751020
CC	CLERK TYPIST	ARRINGTON, MARY	730720
CC	CLERK TYPIST	BENSON, BETTY JEAN	740129
CC	CLERK TYPIST	BERRY SONYA YVETTE	751029
CC	CLERK TYPIST	BLACKMON, DARLENE	720919
CC	CLERK TYPIST	CADDELL, CYNTHIA	730720
CC	CLERK TYPIST	COOK, PAMELA	730108
CC	CLERK TYPIST	DRAKE, ELOISE	730716
CC	CLERK TYPIST	ESCOTT JO ANN	751020
CC	CLERK TYPIST	GEORGE, MARY ANN	720616
CC	CLERK TYPIST	HAMILTON, MALENDIA	750415
CC	CLERK TYPIST	HARRIS, ANNIE	720915
CC	CLERK TYPIST	HOPSON, PHYLLIS	730726
CC	CLERK TYPIST	JONES, BRENDA	750519
CC	CLERK TYPIST	JONES, DOROTHY MADELYN	720907
CC	CLERK TYPIST	KENNEDY, BRENDA	740401
CC	CLERK TYPIST	LAWSON, DELORES	720912
CC	CLERK TYPIST	LEONARD, MAE D.	750107
CC	CLERK TYPIST	MACON THELMA MAE	751029
CC	CLERK TYPIST	MCALPINE, DIANE	720912
CC	CLERK TYPIST	ODEN, CHARLIE M.	740322
CC	CLERK TYPIST	PARNELL, WILLIE	730726
CC	CLERK TYPIST	PATTERSON, JANET	750519

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 PAGE 3

DEPARTMENT	JOB	NAME	DATE OF CERTIFICATION
CC	CLERK TYPIST	PICKETT, VELMA	751020
CC	CLERK TYPIST	WATSON, YVONNE	751107
CC	CLERK TYPIST	WILLIAMS, JO ANN	740129
CC	CLERK TYPIST	WILSON, GERTRUDE	740322
CC	CLERK TYPIST	YELDELL, DOROTHY	740213
CM	CLERK TYPIST	AGEE DEBRA G.	751006
CM	CLERK TYPIST	ALLEN ANNIE	730403
CM	CLERK TYPIST	GRACE GLORIA CORRINE	751006
CM	CLERK TYPIST	HAMILTON MALENDIA	750415
CM	CLERK TYPIST	HUDSON, GERALDINE	730123
CM	CLERK TYPIST	HUSTON BARBARA	730228
CM	CLERK TYPIST	JONES, EDWANITA	741009
CM	CLERK TYPIST	LAWSON, DELORES	721012
CM	CLERK TYPIST	LEONARD, MAE D.	740503
CM	CLERK TYPIST	PEAVY, JUNE	721012
CM	CLERK TYPIST	PICKETT VELMA	750425
CM	CLERK TYPIST	PRICE BARBARA ANN	760302
CM	CLERK TYPIST	SOLOMON LINDA J.	730226
CM	CLERK TYPIST	WARD PATRICIA	741009
CM	CLERK TYPIST	WHITE, VERONICA	740503
DP	KEYP OPER	COWAN THELMA	760507
DP	KEYP OPER	EDWARDS ANGELA	750807
DP	KEYP OPER	GARDNER, DORIS	750807
DP	KEYP OPER	HARTLEY ROASLIND	750819
DP	KEYP OPER	HIGHTOWER, CHERYL	750828
DP	KEYP OPER	HOYDEN HENRIETTA	750326
DP	KEYP OPER	PATTERSON, SANDRA	760507
DP	KEYP OPER	PATTON MARY J.	760630
DP	KEYP OPER	TOYER, ONIDA	760202
DR	AUDITOR	EDWARDS. JEANNE B.	740417
DR	AUDITOR	EDWARDS, JEANNE B.	740417
DR	CLERK TYPIST	AGEE, DEBRA	750818
DR	CLERK TYPIST	ALLEN, ANNIE	730329
DR	CLERK TYPIST	BELLE, SHIRLEY	730122

FEDERAL ENFORCEMENT SECTION
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DEPARTMENT	JOB	NAME	DATE OF CERTIFICATION
DR	CLERK TYPIST	BROWN, IRA	740409
DR	CLERK TYPIST	BROWN, WILMA	750919
DR	CLERK TYPIST	CARTER, SARAH	720906
DR	CLERK TYPIST	CARTER, SHIRLEY	721221
DR	CLERK TYPIST	CHRISTIAN, BARBARA	720727
DR	CLERK TYPIST	COATS, BARBARA	730914
DR	CLERK TYPIST	COLEMAN, LINDA	720912
DR	CLERK TYPIST	COOK, PAMELA	730109
DR	CLERK TYPIST	COX, JOYCE	750701
DR	CLERK TYPIST	DAWSON, RONALD	750821
DR	CLERK TYPIST	GAINES, LINDA	730104
DR	CLERK TYPIST	GEORGE, MARY	720627
DR	CLERK TYPIST	GLOVER, SHARON	721017
DR	CLERK TYPIST	GRACE, GLORIA	750814
DR	CLERK TYPIST	HAMILTON, MALENDIA	750315
DR	CLERK TYPIST	HARRIS, ANNIE	720912
DR	CLERK TYPIST	HARRIS, ROSE	721003
DR	CLERK TYPIST	HILL, EFFIE	740417
DR	CLERK TYPIST	HOUSTON, BARBARA	730227
DR	CLERK TYPIST	JENKINS, ANNIE	741101
DR	CLERK TYPIST	JENKINS, LINDA	731220
DR	CLERK TYPIST	JONES, BRENDA	750508
DR	CLERK TYPIST	JONES, GWENDOLYN	730122
DR	CLERK TYPIST	KENNEDY, BRENDA	740417
DR	CLERK TYPIST	KIMBROUGH, VIRGINIA	750605
DR	CLERK TYPIST	LAWSON, DEBORAH	750730
DR	CLERK TYPIST	LEONARD, MAE	740514
DR	CLERK TYPIST	MCALPINE, DIANE	720912
DR	CLERK TYPIST	MCCLAIN, ELAINE	760304
DR	CLERK TYPIST	MEANS, SYLVIA	750929
DR	CLERK TYPIST	ODEN, CHARLIE	740329
DR	CLERK TYPIST	PATTERSON, JANET	750508
DR	CLERK TYPIST	PORTER, DEBORAH	730111
DR	CLERK TYPIST	RODGERS, DOROTHY	731228
DR	CLERK TYPIST	TERRY, PATRICIA	730122
DR	CLERK TYPIST	THOMAS, VALERIE	740117
DR	CLERK TYPIST	WASHINGTON, CLAIREE	720410
DR	CLERK TYPIST	WHITE, VERONICA	740510
DR	CLERK TYPIST	WILLIAMS, GERALDINE	760315
DR	CLERK TYPIST	WILSON, GERTRUDE	740329
DR	CLERK TYPIST	WILSON, HELEN (MATTHEWS)	730809
DR	COMP OPER	COX, LEWIS	721127
DR	COMP OPER	WILLIAMS, RUFUS	740607

FEDERAL ENFORCEMENT SECTION
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DEPARTMENT	JOB	NAME	DATE OF CERTIFICATION
DR	INTERM CLK	ANDREWS, ALICIA	760128
DR	INTERM CLK	ASHFORD, BRENDA	760511
DR	INTERM CLK	BELL, CASSIE	740819
DR	INTERM CLK	BICKERSTAFF, MAMIE	750218
DR	INTERM CLK	BLACK, DORLESTA	740430
DR	INTERM CLK	CAMEL, DEBRA	751014
DR	INTERM CLK	CARTER, GWENDOLYN	750604
DR	INTERM CLK	CHRISTIAN, BARBARA	740328
DR	INTERM CLK	CORBIN, CORRINE	760316
DR	INTERM CLK	ESCOTT, JOANN	760702
DR	INTERM CLK	FORD, VIRTIE	760511
DR	INTERM CLK	FOWLES, AUDREYE	741213
DR	INTERM CLK	GASTON, BEVERLY	751125
DR	INTERM CLK	GRAYSON, CATHY	740828
DR	INTERM CLK	GRAYSON, SANDRA	750416
DR	INTERM CLK	HIGGINS, GWENDOLYN	750226
DR	INTERM CLK	HILL, JOYCE	751020
DR	INTERM CLK	HUBBARD, SANDRA	760511
DR	INTERM CLK	HUMPHREY, VENDETTA	760316
DR	INTERM CLK	MCCLURE, DEBRA	760316
DR	INTERM CLK	MOORE, JANE W.	750109
DR	INTERM CLK	PARKER, DORIS	730709
DR	INTERM CLK	PERTEET, PATRICIA	741218
DR	INTERM CLK	PINKARD, WILLIE	760107
DR	INTERM CLK	RAMSEY, MYRTLE	740517
DR	INTERM CLK	RUSHON, BELINDA	730319
DR	INTERM CLK	SEAY, PATRICIA	751223
DR	INTERM CLK	THOMAS, WILLIE	751208
DR	INTERM CLK	TOWLES, AUDREYE	741213
DR	INTERM CLK	WASHINGTON, AURELLA	760726
DR	INTERM CLK	ZEIGLER, EDWARD	751223
DR	KEYP OPER	AVERHART, ERA MAE	731004
DR	KEYP OPER	BOYD, JAMES	730503
DR	KEYP OPER	BRYANT, MARY	720914
DR	KEYP OPER	BURTON, ROSA	721011
DR	KEYP OPER	GADSON, GLORIA	731011
DR	KEYP OPER	GLOVER, ALTHEA	741023
DR	KEYP OPER	GOODWIN, LORETTA	731019
DR	KEYP OPER	HARTLEY, ROSALIND	740829
DR	KEYP OPER	HEAD, BERTHA	741021
DR	KEYP OPER	HEARD, EMMA	730503
DR	KEYP OPER	JEFFERSON, ANGELA	740829
DR	KEYP OPER	JOHNSON, JOANN	741023
DR	KEYP OPER	JOHNSON, JOYCE	720829

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DEPARTMENT	JOB	NAME	DATE OF CERTIFICATION
DR	KEYP OPER	JOHNSON, MARY	720829
DR	KEYP OPER	LAMARR, LULA	721003
DR	KEYP OPER	MEANS, SYLVIA	740829
DR	KEYP OPER	ROBY, SARAH	720914
DR	KEYP OPER	SKIPWITH, JOYCE	720907
DR	KEYP OPER	STRODE, BEVERLY	741021
DR	KEYP OPER	WHITSON, WANDA	720531
DR	KEYP OPER	WOODS, SHARON	740829
PW	CLERK TYPIST	ALLEN, ANNIE	730327
PW	CLERK TYPIST	COX, JOYCE D.	750806
PW	CLERK TYPIST	CURRENTON, LINDA	730615
PW	CLERK TYPIST	DENSMORE, MILDRED	750806
PW	CLERK TYPIST	DURR, CORDELIA	730612
PW	CLERK TYPIST	HARRIS, ANNIE	720912
PW	CLERK TYPIST	HOPSON, PHYLLIS	730625
PW	CLERK TYPIST	HOUSER, CAROLYN	731018
PW	CLERK TYPIST	JENKINS, ANNIE M.	741205
PW	CLERK TYPIST	JENKINS, LINDA	740405
PW	CLERK TYPIST	JONES, DOROTHY	720928
PW	CLERK TYPIST	MCALPINE, DIANE	720907
PW	CLERK TYPIST	MCCONNICO, NORRINE	730821
PW	CLERK TYPIST	MOORE, JUANITA	730924
PW	CLERK TYPIST	ODEN, CHARLIE	740405
PW	CLERK TYPIST	PARNELL, WILLIE	730801
PW	CLERK TYPIST	PARSONS, CAROLYN	730829
PW	CLERK TYPIST	PEAVY, JUNIE	721013
PW	CLERK TYPIST	REESE, JR. THEODORE	740405
PW	CLERK TYPIST	SMITH, KENNETH	720928
PW	CLERK TYPIST	THOMAS, VALERIE	730829
PW	CLERK TYPIST	TONEY, DEBRA	741205
PW	ENG AIDE	ABERNATHY, DONALD P.	770928
PW	ENG AIDE	ALLEN, DONALD	750807
PW	ENG AIDE	BARNETT, DEBORAH J.	771018
PW	ENG AIDE	CLARK, JEROME	780810
PW	ENG AIDE	DUNLAP, BERNARD	750807
PW	ENG AIDE	FRANKLIN, JAMES	730523
PW	ENG AIDE	GILMORE, JR. HAROLD	721005
PW	ENG AIDE	GRACE, WARREN	731212
PW	ENG AIDE	HAGER, CAROLYN	750807
PW	ENG AIDE	HAMILTON, LEE	780413

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DEPARTMENT	JOB	NAME	DATE OF CERTIFICATION
PW	ENG AIDE	HARDY, DEBORAH M.	781109
PW	ENG AIDE	HOSKIN, JR. ESAW	721114
PW	ENG AIDE	IRONES, ARMON	760311
PW	ENG AIDE	KING, WILLIAM	780810
PW	ENG AIDE	MCCASLIN, FRANK	731004
PW	ENG AIDE	MOTEM, JR. ROBERT	721009
PW	ENG AIDE	NORWOOD, PERCY	760210
PW	ENG AIDE	SIMON, JR. JESSE M.	781127
PW	ENG AIDE	SMITH, CHARLES	760210
PW	ENG AIDE	TRAVIS, ANGELA	740919
PW	ENG AIDE	TURNER, AMOS	770613
PW	ENG AIDE	WESLEY, JR. HENRY	740307
PW	ENG AIDE	WHITSON, JEAN	730503
PW	ENG AIDE	WILKERSON, ELLIOT	721005
PW	ENG AIDE	WRIGHT, JR. CLAUDE	730524
PW	INT STENO	GILMORE, PATRICIA	750820
PW	INT STENO	HALL, SAUNDRA B.	730316
PW	INTERM CLK	ANDREWS, ALICIA	760219
PW	INTERM CLK	ASHFORD, BRENDA L.	760224
PW	INTERM CLK	AVERY, CYNTHIA L.	770317
PW	INTERM CLK	CAMEL, DEBORAH	751013
PW	INTERM CLK	GATSON, BEVERLY	751210
PW	INTERM CLK	HALL, EVA N.	771207
PW	INTERM CLK	HILL, JOICE ANN	751023
PW	INTERM CLK	PRICE, BARBARA A.	751105
PW	INTERM CLK	RAMSEY, MYRTLE	740717
PW	INTERM CLK	ROBINSON, CHARLOTTE	
PW	INTERM CLK	SKINNER, ARTIE	730309
PW	INTERM CLK	THOMAS, VALERIE	751120
PW	INTERM CLK	THOMAS, WILLIE F.	751210
PW	INTERM CLK	TOWLES, AUDREYE B.	741205
PW	INTERM CLK	VANN, SHIRLEY	730316
PW	INTERM CLK	WALLER, VELMA	720912
PW	PSA (EAT)	BUTLER, DON	720503
PW	PSA (EAT)	JONES, WILLIE	720503
PW	SEW PLT OPER	BURKS, CHARLES	720427
PW	SEW PLT OPER	BURKS, JOHN	721113
PW	SEW PLT OPER	BUTLER, DON	720501

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DEPARTMENT	JOB	NAME	DATE OF CERTIFICATION
PW	SEW PLT OPER	FRANKLIN, JAMES	730719
PW	SEW PLT OPER	GRANT, HOWARD	720515
PW	SEW PLT OPER	HOGAN, LESTER	741203
PW	SEW PLT OPER	HUNT, ROBERT	741210
PW	SEW PLT OPER	JACKSON, NEAL	721113
PW	SEW PLT OPER	JONES, LONNIE	741121
PW	SEW PLT OPER	LEE, JAMES	720901
PW	SEW PLT OPER	MACK, LEO	731012
PW	SEW PLT OPER	PIERCE, MELVIN	730214
PW	SEW PLT OPER	WATTS, RONALD	720619
PW	SEW PLT OPER	WILLIS, FRANK	730104
PW	SEW PLT OPER	WORKS, JON	720901
PW	STORES CLERK	AUSTIN, WILLIE	730109
PW	STORES CLERK	BOONE, ALEXANDER	731023
PW	STORES CLERK	CLYDE, DEBORAH	730213
PW	STORES CLERK	HAWKINS, ALVIN	730131
PW	STORES CLERK	JOHNSON, BERNEEDA	730215
PW	STORES CLERK	LOCKHART, MARIE	730207
PW	STORES CLERK	SAMPLE, OLIVIA	760519
PW	STORES CLERK	SMITH, JOHNNIE	730131
PW	STORES CLERK	TARRANT, EDWARD	741101
PW	STORES CLERK	UPSHAW, WINNIE	730213
PW	STORES CLERK	WILSON, JR. WILLIE	730129
PW	TRUCK DRIVER	BURKS, VESTER	720728
PW	TRUCK DRIVER	CAMP, RUBEN W.	730814
PW	TRUCK DRIVER	DAVIS, RALPH	730425
PW	TRUCK DRIVER	GRAVES, ROBERT	720628
PW	TRUCK DRIVER	GRIER, ANTHONY	731101
PW	TRUCK DRIVER	HURST, DONEL A.	720323
PW	TRUCK DRIVER	MENIFIELD, ALFRED	740108
PW	TRUCK DRIVER	ROBERSON, JEROME	730806
PW	TRUCK DRIVER	SKIPPER, DON R.	750423
PW	TRUCK DRIVER	SPEIGHTS, JOHN	731101
PW	TRUCK DRIVER	WILLIAMS, EARL	731015
SD	CLERK TYPIST	EDWARDS, GLENDA	770309
SD	CLERK TYPIST	GRAYSON, JO ANN	771209
SD	CLERK TYPIST	HUNTER, EFFRIS	780519
SD	CLERK TYPIST	JARVIS, PATRICIA	780310

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DEPARTMENT	JOB	NAME	DATE OF CERTIFICATION
SD	CLERK TYPIST	JOHNSON, JACQUELINE	770519
SD	CLERK TYPIST	MEALING, BRENDA	780519
SD	CLERK TYPIST	WILSON, MARILYN	780510
SD	DEP SHERIFF	ALLEN, III LEWIS	760220
SD	DEP SHERIFF	ALLEN, SHERRY	751215
SD	DEP SHERIFF	AMICK, SHERRY	760120
SO	DEP SHERIFF	ANDERSON, JESSICA	780419
SD	DEP SHERIFF	AUSTIN, FREDERICK	750729
SD	DEP SHERIFF	BAKER, SARA	780419
SD	DEP SHERIFF	BAYLOR, JESIE	781023
SD	DEP SHERIFF	BEACHEM, BRENDA	771121
SD	DEP SHERIFF	BELL, THOMAS	780516
SD	DEP SHERIFF	BELLARD, CONRAD	740313
SD	DEP SHERIFF	BERMAN, BETTIS	750407
SD	DEP SHERIFF	BESTER, SONJA	780201
SD	DEP SHERIFF	BONNER, LESTER	780516
SD	DEP SHERIFF	BOYKIN, ROBERT	750703
SD	DEP SHERIFF	BRASSEALE, LARRY	750306
SD	DEP SHERIFF	BROOKS, JAMES	770513
SD	DEP SHERIFF	BROWN, ANTHONY	770906
SD	DEP SHERIFF	BROWN, BARBARA	751017
SD	DEP SHERIFF	BROWN, DEBORAH	781023
SD	DEP SHERIFF	BROWN, DELORES	780516
SD	DEP SHERIFF	BROWN, RONALD	781128
SD	DEP SHERIFF	CLARK, JAMES	750508
SD	DEP SHERIFF	CLARK, LARRY	770112
SD	DEP SHERIFF	COGMAN, JR. WILLIS	781023
SD	DEP SHERIFF	COLLINS, MOZELLE	770525
SD	DEP SHERIFF	COOK, YVONNE	771004
SD	DEP SHERIFF	CULPEPPER, LESLIE	741119
SD	DEP SHERIFF	CURRY, LEON	770713
SD	DEP SHERIFF	CURTIS, KENNETH	750407
SD	DEP SHERIFF	DAVIS, INEZ	761007
SD	DEP SHERIFF	DAVIS, QUINCY	781023
SD	DEP SHERIFF	DAVIS, RALPH	740227
SD	DEP SHERIFF	DONALD, JAMES	771006
SD	DEP SHERIFF	ECHOLS, SAMMY	771121
SD	DEP SHERIFF	EDWARDS, DONALD	751215
SD	DEP SHERIFF	EMBRY, LEON	771216
SD	DEP SHERIFF	EVAN, JR ELLIOT	780419
SD	DEP SHERIFF	EVANS, RICHARD	780419
SD	DEP SHERIFF	FAIR, ALPHA	780629
SD	DEP SHERIFF	FELDER, DAN	751017
SD	DEP SHERIFF	FOSTER, WELDON	781128

FEDERAL ENFORCEMENT SECTION
APPENDIX F

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DEPARTMENT	JOB	NAME	DATE OF CERTIFICATION
SD	DEP SHERIFF	FRANKLIN, JAMES	780419
SD	DEP SHERIFF	FRANKLIN, ROBERT	760220
SD	DEP SHERIFF	FRITZ, VEOLA	771216
SD	DEP SHERIFF	GARDNER, EDDIE	780201
SD	DEP SHERIFF	GARY, JEANNETTE	771006
SD	DEP SHERIFF	GIRDER, WILLIE	771216
SD	DEP SHERIFF	GRAY, CHARLES	750306
SD	DEP SHERIFF	HAMPTON, MILDRED	770520
SD	DEP SHERIFF	HARRIS, CARL	771004
SD	DEP SHERIFF	HATIFIELD, ROGER	751215
SD	DEP SHERIFF	HAWKINS, ALVIN	740220
SD	DEP SHERIFF	HAWTHORN, THEOPHILUS	740227
SD	DEP SHERIFF	HEAD, RUFUS	720613
SD	DEP SHERIFF	HENDRIX, CLARICE	770630
SD	DEP SHERIFF	HIBBLER, MARY E.	760220
SD	DEP SHERIFF	HICKS, FREDERICK	770630
SD	DEP SHERIFF	HICKS, SAXTON	780516
SD	DEP SHERIFF	HOGAN, ANNIE	760220
SD	DEP SHERIFF	HOGAN, LESTER	781023
SD	DEP SHERIFF	HOLDER, MICHAEL	770603
SD	DEP SHERIFF	HOLIFIELD, ROGER	751215
SD	DEP SHERIFF	HOLLINS, RODERICK	770713
SD	DEP SHERIFF	HOLMES, GLORIA	770906
SD	DEP SHERIFF	HOWARD, DORIS	781128
SD	DEP SHERIFF	JACKSON, NORRIS	770906
SD	DEP SHERIFF	JARMAN, ARTHUR	740620
SD	PEP SHERIFF	JENKINS, JR. BENJAMIN	760120
SD	DEP SHERIFF	JENKINS, SAMUEL	751215
SD	DEP SHERIFF	JOHNSON, EDWARD	740227
SD	DEP SHERIFF	JOHNSON, RECTOR	781023
SD	DEP SHERIFF	JONES, BRUCE E	741024
SD	DEP SHERIFF	JONES, CLEVELAND	771025
SD	DEP SHERIFF	KNOX, RICHARD	781128
SD	DEP SHERIFF	LEE, DAVID	770922
SD	DEP SHERIFF	LEWIS, JOHN	770818
SD	DEP SHERIFF	LEWIS, LUDIE	770418
SD	DEP SHERIFF	LITTLETON, WILLIAM	760120
SD	DEP SHERIFF	LOCKETT, CHARLES	770922
SD	DEP SHERIFF	MARTIN, MATTHEW	771121
SD	DEP SHERIFF	MASSENGALE, GEORGE	761116
SD	DEP SHERIFF	MAZE, LOLITA	770520
SD	DEP SHERIFF	MCCALL, CHARLES	771121
SD	DEP SHERIFF	MCCAMMON, ALBERTA	771121
SD	DEP SHERIFF	MCCLURE, RICKEY	771121
SD	DEP SHERIFF	MCCRAY, GABRIEL	780419
SD	DEP SHERIFF	MCGHEE, JOHN	750508

FEDERAL ENFORCEMENT SECTION
APPENDIX F

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DEPARTMENT	JOB	NAME	DATE OF CERTIFICATION
SD	DEP SHERIFF	MCSWAIN, HENRY	770603
SD	DEP SHERIFF	MERCHANT, MICHAEL	781128
SD	DEP SHERIFF	MERRIWEATHER, WILLIAM	771216
SD	DEP SHERIFF	MILES, RANDY	780201
SD	DEP SHERIFF	MILLER, DORIS	780629
SD	DEP SHERIFF	MIMS, RANDALL	780419
SD	DEP SHERIFF	MOORE, JR JIMMY	750510
SD	DEP SHERIFF	MOORE, LEROY	770525
SD	DEP SHERIFF	NALLS, CLIFFORD	781023
SD	DEP SHERIFF	NICHOLS, GEORGE	780201
SD	DEP SHERIFF	OLIVER, MILTON	780201
SD	DEP SHERIFF	PATTON, LANGFORD	760120
SD	DEP SHERIFF	PEARSON, HARRY	780201
SD	DEP SHERIFF	PERRY, LAWSON	740620
SD	DEP SHERIFF	PITTS, WILLIAM	770329
SD	DEP SHERIFF	PRATHER, LEE	740124
SD	DEP SHERIFF	REDDOCK, CORNELIUS	750103
SD	DEP SHERIFF	REED, IKE	760220
SD	DEP SHERIFF	REYNOLDS, EDWARD	780516
SD	DEP SHERIFF	RICHARDSON, ANTHONY	780516
SD	DEP SHERIFF	ROBERSON, MARY LOU	770519
SD	DEP SHERIFF	ROBINSON, TRUMAN	740313
SD	DEP SHERIFF	RUSSELL, ALBERT	781023
SD	DEP SHERIFF	RUSSELL, JEROME	770329
SD	DEP SHERIFF	SANDERS, COSBY	780201
SD	DEP SHERIFF	SCOTT, GREGORY	780516
SD	DEP SHERIFF	SIMS, THEOPHILUS	740617
SD	DEP SHERIFF	SLAUGHTER, HENRY	780419
SD	DEP SHERIFF	SMITH, JR DOUGLAS	770906
SD	DEP SHERIFF	SMITH, RONALD	731213
SD	DEP SHERIFF	STANLEY, JOHN	780516
SD	DEP SHERIFF	STEWART, HERMAN	780419
SD	DEP SHERIFF	STEWART, JAMES	780419
SD	DEP SHERIFF	STRACENER, DONALD	730510
SD	DEP SHERIFF	SUTTON, EDDIE	780201
SD	DEP SHERIFF	SWEETING, STANLEY	780419
SD	DEP SHERIFF	TERCENI, SIMPLICIA	780516
SD	DEP SHERIFF	THOMAS, RONALD	770818
SD	DEP SHERIFF	THOMPSON, JR. EARLIE	770216
SD	DEP SHERIFF	TODD, JAMES	770329
SD	DEP SHERIFF	TURNER, BILLY	780419
SD	DEP SHERIFF	TURNER, REGINALD	781128
SD	DEP SHERIFF	VAIL, JAMES	770727
SD	DEP SHERIFF	WARD, BOB	750703
SD	DEP SHERIFF	WHITE, JR. JUDGE	780419
SD	DEP SHERIFF	WILLIAMS, FREDERICK	740227

FEDERAL ENFORCEMENT SECTION
APPENDIX F

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DEPARTMENT	JOB	NAME	DATE OF CERTIFICATION
SD	DEP SHERIFF	WILLIAMS, GWEN	1978
SD	DEP SHERIFF	WILLIAMS, HATTIE	770302
SD	DEP SHERIFF	WILSON, LEND	761023
SD	DEP SHERIFF	WOODS, SARAH	770525
SD	DEP SHERIFF	WOODS, STEPHEN	740227
SD	FOOD SERV SUPV	COLLINS, MOZELE	
SD	FOOD SERV SUPV	DAVIS, INEZ	761007
SD	FOOD SERV SUPV	MASSENGALE, GEORGE	761116
SD	FOOD SERV SUPV	MOORE, LEROY	
SD	INTERM CLK	AVERY, CYNTHIA	770425
SD	INTERM CLK	BELL, CASSIE	761116
SD	INTERM CLK	CAMEL, DEBRA	751022
SD	INTERM CLK	CHRISTIAN, BARBARA	740411
SD	INTERM CLK	DUNN, OLIVETTE C.	771010
SD	INTERM CLK	GATSON, BEVERLY	751120
SD	INTERM CLK	HAYDEN, JACQUELYN	771202
SD	INTERM CLK	HOWARD, DEBORAH	770722
SD	INTERM CLK	MCCRAY, LINDA	780321
SD	INTERM CLK	OWENS, NAOMI	771024
SD	INTERM CLK	PEEPLES, SHERYL	771024
SD	INTERM CLK	PICKETT, VELMA	780503
SD	INTERM CLK	SILMAN, BETTY	750120
SD	INTERM CLK	THOMAS, VALERIE	750818
SD	INTERM CLK	THOMAS, WILLIE	750120
SD	INTERM CLK	TONEY, DEBRA	780308
SD	INTERM CLK	WADE, PATRICIA	770425
SD	STENOGRAPHER	FORD, VIRTIE	770606
SD	STENOGRAPHER	HOLLOWAY, LINDA	780818
SD	STENOGRAPHER	MOSS, SERGAVA	780106
SD	STENOGRAPHER	SMITH, ELAINE	770404
SD	STENOGRAPHER	STUCKEY, RENITA	780106

[END OF REPORT]

APPENDIX G-1

Notice To [Individuals on Appendix E]

Dear Mr. (Ms.) _____:

This notice is to inform you of your right to present a claim for back pay relief under a Consent Decree between the plaintiffs and Jefferson County in the consolidated actions of: John W. Martin, et al. v. City of Birmingham, C.A. No. 74-P-0017-S, and United States of America v. Jefferson County, et al., C.A. No. 75-P-0666-S.

If you wish to present a claim for back pay relief in these cases, please fill out the enclosed proof of claim form and mail it to the Clerk of the Court for the Northern District of Alabama. Enclosed for your use is an unstamped envelope containing the mailing address of the Clerk of the Court.

Your proof of claim form must be received by the Clerk of the Court no later than _____ p.m. on _____, 1982. If you do not file this proof of claim form with the Clerk of the Court by that date then, absent good cause shown, you will be deemed to have waived your right to present a claim for back pay relief under the Consent Decree.

After your proof of claim form is filed, it will be reviewed by attorneys for the plaintiffs who will make a recommendation to the Court whether your claim merits an award of back pay under the Consent Decree. The County has agreed not to contest any of the individual back pay determinations.

After final determinations have been made of the back pay awards to be made under this Consent Decree, you will be notified of your individual award, if any. If you are not offered a back pay award under the Consent Decree, or if you are not satisfied with the amount of back pay provided to you, you will have the right to file an objection to the resolution of your claim with the Clerk of the Court. That objection will be subsequently ruled upon by the District Court. The procedures for filing any such objections will be explained to you in the notice you will receive informing you of your award of relief, if any.

If you have any questions with respect to this notice, the Consent Decree, or the procedures for filing your proof of claim form, you may call or write any of the attorneys listed below:

Attorneys for the United States:

Richard J. Ritter
United States Department of Justice
Civil Rights Division
Washington, D. C. 20530
(202) 633-3895

Caryl Privett
Assistant United States Attorney
Northern District of Alabama
200 Federal Courthouse
Birmingham, Alabama 35203
(205) 254-1785

Attorneys for the Plaintiffs in Martin, et al. v. the City of
Birmingham:

Stephen L. Spitz
Lawyers Committee for Civil Rights Under Law
Suite 520
733 Fifteenth Street, N.W.
Washington, D. C. 20005
(202) 628-6700

Susan Reeves
Reeves & Still
2027 First Avenue North
Suite 400
Birmingham, Alabama 35203
(205) 322-7479

APPENDIX G-2

Notice To [Individuals on Appendix F]

Dear Mr. (Ms.) _____:

This notice is to inform you of your right to present a claim for individual relief under a Consent Decree between the plaintiffs and Jefferson County in the consolidated actions of: John W. Martin, et al. v. City of Birmingham, C.A. No. 74-P-0017-S; and United States of America v. Jefferson County, et al., C.A. No. 75-P-0666-S.

If you wish to present a claim for individual relief, please fill out the enclosed proof of claim form and mail it to the Clerk of the Court for Northern District of Alabama. Enclosed for your use is an unstamped envelope containing the mailing address of the Clerk of the Court.

Your proof of claim form must be received by the Clerk of the Court no later than _____ p.m. on _____, 1982. If you do not file this proof of claim form with the Clerk of the Court by that date then, absent good cause shown, you will be deemed to have waived your right to present a claim for individual relief under the Consent Decree.

After your proof of claim form is filed, it will be reviewed by attorneys for the plaintiffs who will make a recommendation to the Court whether your claim merits an award of individual relief under the Consent Decree based on various factors including the date of certification by the Personnel Board, the pay rate for the job, and the reasons asserted for your not being selected for the job. Such an award may include a job offer or promotion with the County, remedial seniority and/or back pay. The County has reserved the right to review and to object to any individual job offers and/or remedial seniority dates proposed by counsel for the plaintiffs on your behalf which have not been previously agreed upon by the parties under the Consent Decree. The County has agreed not to contest any of the individual back pay determinations. If any objections are raised by the County to any proposed job offers and/or remedial seniority for you, and if the parties are unable to resolve such objections, then the Court will determine the appropriate relief, if any, for you under this Consent Decree.

After final determinations have been made of the individual awards of relief to be made under this Consent Decree, you will be notified of your individual award, if any. If you do not receive an award of individual relief

under the Consent Decree, or if you are not satisfied with the amount of relief provided to you, you will have the right to file an objection to the resolution of your claim with the Clerk of the Court. That objection will be subsequently ruled upon by the District Court. The procedures for filing any such objections will be explained to you in the notice you will receive informing you of your award of relief, if any.

If you have any questions with respect to this notice, the Consent Decree, or the procedures for filing your proof of claim form, you may call or write any of the attorneys listed below:

Attorneys for the United States:

Richard J. Ritter
United States Department of Justice
Civil Rights Division
Washington, DC 20530
(202) 633-3895

Caryl Privett
Assistant United States Attorney
Northern District of Alabama
200 Federal Courthouse
Birmingham, Alabama 35203
(205) 254-1785

Attorneys for the Plaintiffs in Martin, et al.
v. the City of Birmingham

Stephen L. Spitz
Lawyers Committee for
Civil Rights Under Law
Suite 520
733 Fifteenth Street, N.W.
Washington, DC 20005
(202) 628-6700

Susan Reeves
Reeves & Still
2027 First Avenue North
Suite 400
Birmingham, Alabama 35203
(205) 322-7479

APPENDIX H

Proof of Claim Form

Please list your:

Name: _____

Race: _____

Current Address: _____

Current Telephone Number: _____

Please check the box below if the statement listed next to the box applies to you and you wish to present a claim for relief under the Consent Decree with Jefferson County.

I am a black person who took a written test administered by the Personnel Board of Jefferson County for a job as a Deputy Sheriff with Jefferson County. I wish to present a claim for relief under the Consent Decree with Jefferson County.

Please sign and date this proof of claim form and return it to the Clerk of the Court in the enclosed self-addressed envelope.

Signature

Date: _____

Social Security Number

APPENDIX I

Proof of Claim Form

If you wish to present a claim for individual relief under the Consent Decree with Jefferson County please sign and date this proof of claim form and furnish the information requested below. This information will be reviewed by counsel for Jefferson County for the purpose of determining the relief to be provided to you, if any, under the Consent Decree.

1. Please list your:

Name: _____

Race: _____

Current Address: _____

Current Telephone Number: _____

2. Records obtained from the Jefferson County Personnel Board indicate that you were certified and not hired for the job(s) of _____ in the Department(s) of _____ of Jefferson County on or about _____ date(s).

Please indicate in the space provided below in as much detail as possible and to the best of your recollection the following information. If you need more space to supply this information you may attach additional sheets of paper to this proof of claim form.

(i) Please list your mailing address and telephone number at or around the time you were certified for the job(s) listed above, and indicate whether you were living at that address at that time.

(ii) Please indicate whether you were ever contacted by anyone at Jefferson County for an interview for the job(s) in the department(s) listed above at or around the date(s) listed above, and, if so, please indicate whether you appeared for that interview and describe what happened during that interview.

(iii) Please indicate whether you would have accepted an offer of employment in the job(s) and at the department(s) listed above had such offer(s) been made to you at or about the time you were certified for such position(s).

3. Please indicate whether at any time subsequent to your being certified for the job(s) in the department(s) listed in paragraph 2 above, you were ever offered employment by Jefferson County in another job. If so, please identify: (1) the job(s) you were offered, (2) the departments (if known) in which that job existed, (3) the approximate date(s) of the offer, (4) whether you accepted such offer, and your approximate dates of employment in that job(s).

4. Please indicate whether at any time subsequent to your being certified for the job(s) in the department(s) listed in paragraph 2 above, you were ever offered employment by the City of Birmingham, or the Jefferson County Health Department, or any of the following municipalities: Bessemer, Fairfield, Fultondale, Gardendale, Homewood, Hueytown, Midfield, Mountain Brook, Pleasant Grove, Tarrant, or Vestavia Hills. If so, please identify: (1) which of the above cities, departments or municipalities offered you employment, (2) the job that you were offered, (3) whether you accepted such offer and your approximate date(s) of employment in that job(s).

Please sign and date this proof of claim form and return it to the Clerk of the Court in the enclosed self-addressed envelope.

Signature
Date: _____

Social Security Number

APPENDIX J

RELEASE

For and in consideration of the sum of [sum spelled out] Dollars (\$ _____) and all other relief to be provided me by Jefferson County pursuant to the provisions of the Consent Decree with Jefferson County entered by the Honorable Sam C. Pointer, Jr., United States District Judge, on [___date___] in the consolidated actions of United States v. Jefferson County, et al., C.A. No. 75-P-0666-5, and John W. Martin, et al., v. City of Birmingham, et al., C.A. No. 74-8-0017-S, I [full name of claimant], for self and for my heirs, executors, administrators and assigns hereby release and discharge Jefferson County, its officials, agents, and employees of and from all legal and equitable claims arising out of the subject matter of these consolidated actions or any other legal, equitable or administrative claims or causes of action arising out of alleged discrimination on the basis of either race or sex by Jefferson County, in violation of any Federal, state or local equal employment opportunity laws, statutes, regulations or ordinances occurring prior to the date of the execution of this release.

I understand and agree that none of the parties hereby released, nor any other party, admits that I have any just claim against them or anyone else in respect to my said employment with Jefferson County, or application thereof, and that none of the parties hereby released, nor any other party, admits or has admitted liability to me or anyone else on account of any payment herein recited to have been made to me, or otherwise.

I carefully have read this Release as well as the accompanying Consent Decree entered [_____ date ____]. I fully comprehend and understand that by signing this Release I am releasing my claim for back pay, and that I am entitled to no other payment of monies for any claim of employment discrimination prior to the date this Release is executed from Jefferson County except as recited herein.

I further certify and warrant that I have had the opportunity to consult an attorney prior to execution of this Release; that I am of lawful age; and, that I am signing this Release of my own free act and deed.

Signed this ____ day of _____, 1982.

Signature

Social Security Number _____

Subscribed and sworn to before me this undersigned authority on this ____ day of _____, 1982, to certify which witness my hand and seal of office.

NOTARY PUBLIC

APPENDIX K

NOTICE OF PROPOSED SETTLEMENT AGREEMENTS

AND CONDITIONAL CLASS CERTIFICATION

There is currently before the United States District Court for the Northern District of Alabama a proposed settlement agreement with Jefferson County in the following consolidated employment discrimination actions: John W. Martin, et al. v. City of Birmingham, et al. (C.A. No.74-E-17-S), and United States of America v. Jefferson County, et al. (C.A. No.75-P-0666-S).

The proposed settlement agreement is in the form of a Consent Decree. The Consent Decree will resolve all of the plaintiffs' claims of employment discrimination against blacks and women by Jefferson County.

On _____, 1982 the District Court entered an Order granting provisional approval to the Consent Decree, subject to further hearings. In that Order the Court withheld final approval of the Consent Decree until after hearing any objections which may be filed to it, as further explained in Part II of this Notice.

I.

Class Certification Ruling

On ____, 1982 the District Court entered an Order pursuant to Rule 23(b)(2) of the Federal Rules of Civil Procedure in the Martin action. In that Order the Court conditionally certified for purposes of this settlement agreement the following classes of black individuals who may be eligible to present a claim for back pay and other relief under the Consent Decree.

1. All black persons who took the written test for the job of Deputy Sheriff that resulted in eligibility lists for that job which were in effect between April 25, 1975 and January 10, 1977, who have not been hired as Deputy Sheriffs by the County, or who, subsequent to January 10, 1977, were hired as Deputy Sheriffs by the County but who may have been hired earlier in that job but for their rank on such eligibility lists.

2. All black persons who were certified by the Personnel Board and not hired by the County from certification to the following jobs and departments, during the following periods of time:

	<u>Department</u>	<u>Job</u>	<u>Time Period</u>
a.	Board of Equalization	Clerk Typist	March 24, 1972-December 31, 1976
		Intermediate Clerk	March 24, 1972-December 31, 1976
b.	Building Services	Electrician	March 24, 1972-December 31, 1976
		Voting Machine Mechanic	March 24, 1972-December 31, 1976
		Watchman/Guard	March 24, 1972-December 31, 1976
c.	Circuit Court	Clerk Typist	March 24, 1972-December 31, 1976
d.	Criminal Court	Clerk Typist	March 24, 1972-December 31, 1976
e.	Data Processing	Keypunch Operator	March 24, 1972-December 31, 1976
f.	Public Works	Engineering Aide	March 24, 1972-December 31, 1978
		Clerk Typist	March 24, 1972-December 31, 1976
		Intermediate Clerk	March 24, 1972-December 31, 1976
		Intermediate	
		Stenographer	March 24, 1972-December 31, 1976
		Stores Clerk	March 24, 1972-December 31, 1976
		Truck Driver	March 24, 1972-December 31, 1976
		Sewage Plant Operator	March 24, 1972-December 31, 1976
		Public Service Aide	March 24, 1972-December 31, 1976
g.	Revenue	Clerk Typist	March 24, 1972-December 31, 1976
		Intermediate Clerk	March 24, 1972-December 31, 1976
		Computer Operator	March 24, 1972-December 31, 1976
		Keypunch Operator	March 24, 1972-December 31, 1976
h.	Sheriff	Deputy Sheriff	March 24, 1972-December 31, 1978
		Intermediate Clerk	March 24, 1972-December 31, 1978
		Watchman	March 24, 1972-December 31, 1976
		Food Service Supervisor	March 24, 1972-December 31, 1976
		Stenographer	January 1, 1977-December 31, 1978

The Consent Decree also provides relief to certain black individuals identified in Appendix D to the Consent Decree who were certified and not hired by the County in certain other jobs and departments who the plaintiffs believe have claims that merit relief under the Consent Decree. Finally, the Consent Decree provides relief for certain women identified in Appendix C to the Consent Decree who were certified and not hired, allegedly because of their sex, in the jobs and departments listed next to their names in that Appendix.

II.

Notice of Right to File Objections to the
Consent Decrees and Fairness Hearing

This notice is directed to all persons who have an interest which may be affected by the Consent Decree with Jefferson County. Copies of the Consent Decree and the entire file in this proceeding are on file in the office of the Clerk of the Court for the Northern District of Alabama. They may be examined in the Clerk's office during normal working hours (Mon.-Fri. 8 a.m.-4:30 p.m.). The address of the Clerk's office is 1800 Fifth Avenue North, Birmingham, Alabama 35203. Any person who wishes to register an objection(s) to the Consent Decree must file such objection(s) in writing with the Clerk of the Court by _____ p.m., _____, 1982. Objections filed after that date will not be considered by the Court in determining whether to grant final approval to the Consent Decree.

On _____, 1982, at _____ o'clock the District Court will hold a fairness hearing at which it will consider any timely filed objections to the Consent Decree. Individual objectors may appear at that hearing with or without the assistance of legal counsel.

III.

General Summary of the Consent Decree With Jefferson County

The Consent Decree contains a number of general injunctive provisions, including affirmative recruitment goals for blacks and women, each of which are designed to correct for the effects of any alleged past discrimination and to ensure equal employment opportunities for all applicants and employees with the County. The Consent Decree also provides for back pay relief for the various classes and individuals described above. Details of the general injunctive provisions and the back pay relief are set out in the Consent Decree that is on file in the office of the Clerk of the Court.

APPENDIX L

<u>Department</u>	<u>Job</u>	<u>Race/Sex</u>	<u>Number of Job Vacancies</u>
Public Works	Clerk Typist	black	1
	Intermediate Clerk	black	4
	Intermediate Stenographer	black	1
	Stores Clerk	black	1
	Stores Clerk	female	2
	Sr. Stores Clerk	female	1
	Engineering Aide	black	8
	Engineering Aide	female	4
	Truck Driver	black	3
	Truck Driver	female	1
	Sewage Plant Opr.	black	5
	Sewage Plant Opr.	female	1
	Water Pollution Inspector	female	2
	Inspector	black	1
	Civil Engineer	black	1
	Watchman	black	2
Board of Equalization	Clerk Typist	black	7
	Intermediate Clerk	black	1
Building Services	Electrician	black	1
	Maintenance Repair Worker	black	1
	Voting Machine Mechanic	black	1
	Watchman/Guard	black	1
	Sr Stores Clerk	female	1
Revenue	Clerk Typist	black	5
	Intermediate Clerk	black	6
	Revenue Examiner	female	3
Data Processing	Keypunch Operator	black	2
Sheriff	Deputy Sheriff	black	14
	Deputy Sheriff	female	3
	Food Serv. Supv.	black	1
	Watchman	black	2
	Communication Serv. Clerk	black	1
	Intermediate Clerk	black	2
County Home	Stores Clerk	female	2
	Head Cook	black	1
Inspection Services	Building Inspector	black	1
Tax Collector	Tax Agent	female	2
	Intermediate Clerk	black	2
Comptroller	Accountant	female	1

Printing	Intermediate Clerk	black	1
	Tax Assessor	black	2
	Total Number of Job Vacancies		102