Hollins University

Hollins Digital Commons

Ann B. Hopkins Papers

Manuscript Collections

3-14-1985

Civil Action No. 84-3040 Plaintiff's PreTrial Package

United States District Court for the District of Columbia

Follow this and additional works at: https://digitalcommons.hollins.edu/hopkins-papers



Part of the Civil Rights and Discrimination Commons

Shaell 3/14/85

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

FILED

MAR 1 4 1985

ANN B. HOPKINS,) CIERK, U.S. DISTRICT COURT DISTRICT OF COLUMBIA
	Plaintiff,	ý
v .) Civil Action No. 84-3040
PRICE WATERHOUS	SE,	Ś
	Defendant.))

PLAINTIFF'S PRETRIAL PACKAGE

Attached hereto are:

- 1. Plaintiff's Witness List;
- 2. Plaintiff's Exhibit List; the exhibits themselves have been pre-marked;
- Plaintiff's Trial Brief; and
- 4. Plaintiff's Proposed Findings of Fact.

The parties have not yet been able to agree on stipulations but hope to be able to do so before trial. Paragraphs 1-44 of Plaintiff's Proposed Findings of Fact represent plaintiff's proposal as to stipulations.

In response to a discovery request for earnings data on partners, Price Waterhouse stated that it would provide such data "only in connection with a damages determination," i.e., only if there is a finding of liability (see Defendant's Responses to Plaintiff's Supplemental Discovery Requests at No. 4). If there is such a finding, the parties may be able to agree on relief. Failing this, it may be necessary to make a further submission to

the Court, although an evidentiary hearing may not be needed.

Respectfully submitted

Douglas B. Huron

James H. Heller

KATOR, SCOTT & HELLER 1029 Vermont Avenue, N.W. Suite 900 Washington, D.C. 20005 (202) 393-3800

Attorneys for Plaintiff