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

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

v.)

No. CV 12-1830-EMC

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

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

v.)

**JOINT MOTION FOR ENTRY
OF CONSENT DECREE,
INCLUDING PERMANENT
INJUNCTION¹; ORDER THEREON**

LAW SCHOOL ADMISSION COUNCIL, INC.)
Defendant.)

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

v.)

LAW SCHOOL ADMISSION COUNCIL, INC.)
Defendant.)

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

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

10 DATED: May 20, 2014

Respectfully submitted,

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

FOR THE UNITED STATES
OF AMERICA:

14 PHYLLIS W. CHENG
15 Director

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Acting Assistant Attorney General
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16 JON ICHINAGA
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24 /s/ Mari Mayeda
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4 **FOR THE UNITED STATES**
5 **OF AMERICA, CONTINUED:**

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8 ALEX G. TSE
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10 /s/ Melanie L. Proctor
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17 **FOR THE LAW SCHOOL**
18 **ADMISSION COUNCIL, INC.:**

19 /s/ Robert Burgoyne
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FOR ANDREW QUAN, NICHOLAS
JONES, AND ELIZABETH
HENNESSEY-SEVERSON:

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

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

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

3 The Court has before it the Joint Motion for Entry of Consent Decree, Including
4 Permanent Injunction. Upon consideration of the terms of the Consent Decree, and in light of
5 the agreement of the parties, it is this 29th day of May 2014 hereby ORDERED that:
6

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

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

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

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

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

