

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES EQUAL EMPLOYMENT)	
OPPORTUNITY COMMISSION,)	
)	
Plaintiff,)	
)	Case No. 05 cv 0208
v.)	
)	Judge James Zagel
SIDLEY AUSTIN, LLP,)	
)	
Defendant.)	

**SUPPLEMENTAL MEMORANDUM IN SUPPORT
OF EEOC’S MOTION TO COMPEL CLIENT COMPLAINT INFORMATION**

In further support of the fact that in making decisions as to whom to strip of partnership status pursuant to the 1999 Momentum Plan Sidley did not proceed on practice group or office by office basis, EEOC directs the Court’s attention to the recent deposition testimony of G. Paul Moates. Mr. Moates’s deposition was taken on March 29, 2007, after EEOC filed its Sur-Sur-Reply in Support of its Motion to Compel Client Complaint Information. Mr. Moates, who has been a member of the firm’s Executive Committee since 1989, testified as follows:

<redacted>

Deposition of Paul Moates at pp. 23-24, 85-86, attached as Exhibit A (exhibit filed under seal).

Respectfully submitted,

s/ Justin Mulaire for Laurie Elkin
Laurie S. Elkin
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