

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

UNITED STATES EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,

Plaintiff,

v.

SIDLEY AUSTIN BROWN & WOOD LLP,

Defendant.

Case No. 05 CV 0208

Judge James B. Zagel  
Magistrate Judge Ashman

**SIDLEY AUSTIN BROWN & WOOD LLP'S  
MOTION FOR LEAVE TO FILE OBJECTIONS TO EEOC'S SUBMISSION**

Sidley Austin Brown & Wood LLP ("Sidley") seeks leave to file objections to the EEOC's Submission Regarding Procedure for Objecting to Production of Personnel Files ("Submission"). In support of this motion, Sidley states as follows:

1. On August 18, 2005, the EEOC filed its Submission, providing what it calls "suggestions" for the procedure of notifying individuals that their personnel files<sup>1</sup> and performance records may be disclosed in discovery.
2. Many of these suggestions are one-sided. None have been discussed with Sidley.
3. Sidley's three-page Objection to the EEOC's Submission is short, concise and will identify the differences in the two parties' positions to assist the Court in fashioning an appropriate notice to individuals.

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<sup>1</sup> The EEOC suggests that individuals be notified of the potential disclosure of their personnel file only, and not other performance-related information.

WHEREFORE, Sidley seeks leave to file its Objections to the EEOC's

Submission, attached hereto as Exhibit A.

Dated: August 23, 2005

Respectfully submitted,

SIDLEY AUSTIN BROWN & WOOD LLP

By:  \_\_\_\_\_  
One of Its Attorneys

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