

Request for Admission No. 2: Admit that on October 21, 1999, it was the general policy of Sidley & Austin not to permit a partner of the firm to continue as a partner commencing the first of the year following the year age 65 is reached.

RESPONSE: Sidley denies that it was the general policy of Sidley & Austin “not to permit a partner of the firm to continue as a partner commencing the first of the year following the year age 65 is reached.” Both before and after October 21, 1999, various individuals continued at Sidley and Austin as a partner after the “first of the year following the year” at which they reached the age of 65. Sidley further states, as a qualification to this Response, that Sidley’s general expectations regarding the retirement of partners in 1999 were as set forth in Sidley’s Amended and Supplemental Response to No. 21 of the EEOC’s First Set of Requests for Admission, which is incorporated fully herein.

Request for Admission No. 3: Admit that the following statement made in Exhibit A was true as of October 21, 1999: “it is the general policy of Sidley & Austin not to permit a partner of the firm to continue as a partner commencing the first of the year following the year age 65 is reached.”

RESPONSE: Sidley denies that it was the general policy of Sidley “not to permit a partner of the firm to continue as a partner commencing the first of the year following the year age 65 is reached.” Sidley further states that this letter was sent by Mr. White at the request of Mr. Wilbur Delp, who requested the letter to address a particular issue relating to Mr. Delp’s retirement. Mr. White did not seek or obtain the approval of Sidley’s Management or Executive Committee to send this letter. Mr. White did not discuss the language of the letter with anyone other than Mr. Delp. Sidley further states, as a qualification to this Response, that the general expectations regarding retirement of its partners were as set forth in Sidley’s Amended and Supplemental Response to No. 21 of the EEOC’s First Set of Requests for Admission, which is incorporated fully herein.

Request for Admission No. 4: Admit that the following statement made in Exhibit A was false as of October 21, 1999: “it is the general policy of Sidley & Austin not to permit a

partner of the firm to continue as a partner commencing the first of the year following the year age 65 is reached.”

RESPONSE: Sidley objects to the undefined term “false” as ambiguous to the extent that it implies that Sidley or Mr. White intended to provide misleading or untrue information in the October 21, 1999 letter. Notwithstanding and subject to this objection, Sidley admits that that the quoted statement does not accurately describe Sidley’s general policy concerning partners who have reached the age of 65. As a qualification to this response, Sidley further states that this letter was sent by Mr. White at the request of Mr. Wilbur Delp, who requested the letter to address a particular issue relating to Mr. Delp’s retirement. Mr. White did not seek or obtain the approval of Sidley’s Management or Executive Committee to send this letter. Mr. White did not discuss the language of the letter with anyone other than Mr. Delp. Sidley further states that the general expectations regarding retirement of its partners were as set forth in Sidley’s Amended and Supplemental Response to No. 21 of the EEOC’s First Set of Requests for Admission, which is incorporated fully herein.

Request for Admission No. 6: Admit that for at least part of the year 1999 Judith Praitis was head of the Environmental practice group in Los Angeles.

RESPONSE: Sidley admits that, for at least part of the year 1999, Judith Praitis was head of the Environmental practice group in Los Angeles.

Request for Admission No. 7: Admit that as of March 1, 2000, Judith Praitis was head of the Environmental practice group in Los Angeles.

RESPONSE: Sidley admits that, as of March 1, 2000, Judith Praitis was head of the Environmental practice group in Los Angeles.

Request for Admission No. 8: Admit that as of February 2, 2001, Judith Praitis was head of the Environmental practice group in Los Angeles.

RESPONSE: Sidley admits that as of February 2, 2001, Judith Praitis was head of the Environmental practice group in Los Angeles.

Appendix A

GENERAL OBJECTIONS

1. Sidley objects to the EEOC's Requests to the extent they purport to impose burdens or obligations that exceed the requirements of Fed. R. Civ. P. 36.
2. Sidley objects generally to the EEOC's Requests to the extent they seek to elicit information protected from disclosure by the attorney-client, work product doctrine, or any other applicable privilege. Any disclosure of information protected by any such privilege or doctrine shall be deemed inadvertent and shall not constitute waiver of such privilege.
3. Sidley objects generally to the EEOC's Requests due to the EEOC's failure to define several vague and ambiguous terms used by the EEOC in various Requests, the interpretation of which makes answering burdensome and/or impossible.
4. Sidley objects to the EEOC's Requests to the extent they seek information not within Sidley's control, custody, or possession.
5. Sidley objects to the overbroad time period covered by the Requests.
6. Sidley's investigation regarding the subject matter of these Requests continues, and it reserves the right to supplement its Responses to these Requests in accordance with applicable rules.
7. These General Objections are continuing and are incorporated within each and every Response set forth above, and are not separately stated herein.