

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

EQUAL EMPLOYMENT OPPORTUNITY	)	
COMMISSION,	)	
	)	
Plaintiff,	)	
	)	
ASHLEY ALFORD,	)	Case No. 3:08-cv-683-MJR
	)	
Plaintiff/Intervenor,	)	
	)	
v.	)	
	)	
AARON RENTS, INC.,	)	
	)	
Defendant.	)	

**AMENDED SCHEDULING AND DISCOVERY ORDER**

On June 19, 2009, the Court held an In-Person Scheduling and Discovery Conference in this matter. Jan Shelly appeared on behalf of Plaintiff Equal Employment Opportunity Commission; Judy L. Cates and David I. Cates appeared on behalf of Plaintiff/Intervenor Ashley Alford; Richard M. Escoffery appeared on behalf of Defendant Aaron Rents, Inc., and Greg E. Roosevelt appeared on behalf of Defendant Richard Moore. The Court **ORDERS** the following:

1. By **June 30, 2009**, Plaintiff, Plaintiff/Intervenor, and Defendant shall produce privilege logs.
2. By **June 30, 2009**, to the extent they exist, Defendant Aaron Rents, Inc., shall produce Bell South Telephone bills for April 2006.
3. By **June 30, 2009**, to the extent they exist, Defendant Aaron Rents, Inc. shall produce detailed reports of telephone calls made to Aaron Rents Sexual Harassment Hotline (similar to Plaintiff’s hearing exhibits 2 and 3) in the months of March, April, and May 2006. These documents shall be produced for the limited purpose of the examination of the process and procedures in place for the Aaron Rents Sexual Harassment Hotline. The parties are granted leave to file a motion for protective order pursuant to Fed. R. Civ. P. 26(c).
4. On **July 1, 2009**, in Atlanta, Plaintiffs shall take the Rule 30(b)(6) deposition of the employee designated by Defendant Aaron Rents to give testimony regarding:

- a. All aspects of Defendant's policies regarding the recording of any and all calls, the billing for any and all calls, the follow-up on any and all calls, and any follow-up to "hang ups" made to the Defendant's "harassment hotline" as identified in Defendant's documents Bates-stamped 6800 through 6842.
  - b. Any and all records, including but not limited to e-mails and all handwritten and typed notes, kept in response to all complaints referred to in Defendant's documents Bates-stamped 6843 through 6899.
  - c. Any and all employee complaints of sex discrimination and/or sexual harassment made at all stores over which Brad Martin has had any supervisory duties during Martin's tenure with Defendant.
  - d. Any and all employee complaints of retaliation made in any store over which Brad Martin has had any supervisory duties during Martin's tenure with Defendant.
  - e. Any and all complaints of failure to promote based on gender made in any store over which Brad Martin has had any supervisory duties during Martin's tenure with Defendant.
5. **On July 16, 2009, at 8:30 a.m.** in the Federal Courthouse in East St. Louis, Illinois, Defendant shall depose Plaintiff Ashley Alford.
  6. **On August 3, 2009, at 9:00 a.m.** in the Federal Courthouse in East St. Louis, Illinois, Defendant shall depose Belinda Woods.
  7. **On August 3, 2009, at 1:00 p.m.** in the Federal Courthouse in East St. Louis, Illinois, Defendant shall depose Damien Daniels.
  8. **On August 4, 2009, at 8:30 a.m.** in the Federal Courthouse in East St. Louis, Illinois, Defendant shall depose James Woods.
  9. **On August 13, 2009, at 8:30 a.m.** in the Federal Courthouse in East St. Louis, Illinois, Plaintiffs shall depose Defendant Richard Moore.
  10. **On August 14, 2009, at 8:30 a.m.** in the Federal Courthouse in East St. Louis, Illinois, Plaintiffs shall depose Brad Martin.
  11. **On August 24, 2009, at 9:00 a.m.** in the Federal Courthouse in East St. Louis, Illinois, Defendant shall depose Joe Skortz.
  12. **On August 25, 2009, at 9:00 a.m.** in the Federal Courthouse in East St. Louis,

Illinois, Defendant shall depose Harold Emde.

13. **On August 25, 2009, at 1:30 p.m.** in the Federal Courthouse in East St. Louis, Illinois, Plaintiffs shall take the Rule 30(b)(6) deposition of the employee designated by Defendant Aaron Rents to give testimony regarding:
  - a. Any and all aspects of Defendant's policies regarding the use and retention of videotapes produced from any and all video cameras that have been in the store at which Ashley Alford worked.
  - b. Any and all policies for recordkeeping procedures for all computer entries made by each employee at the store at which Ashley Alford worked.
  - c. Any and all policies for recordkeeping procedures for the names, purchases, payment histories, and contact information of clients who were customers at the store at which Ashley Alford worked.

(If it is determined that the designated deponent resides in Atlanta, this deposition shall be taken on **July 1, 2009**, in Atlanta, Georgia, after the deposition described in paragraph 4, above.)

14. **On August 31, 2009, at 9:00 a.m.** in Atlanta, Georgia, at the offices of Defendant's counsel, Plaintiffs shall depose Vanessa Adams.
15. **On September 1, 2009, at 9:00 a.m.** in Atlanta, Georgia, at the offices of Defendant's counsel, Plaintiffs shall depose Chad Strickland.
16. **On September 9, 2009, at 9:00 a.m.** in Nashville, Tennessee, (location to be determined), Plaintiffs shall depose Todd Coppedge.
17. The parties are **ORDERED** to contact Courtroom Deputy Jackie Payton to determine where in the East St. Louis Courthouse depositions will be held. Ms. Payton may be contacted at (618) 482-9376.

**DATED: June 22, 2009**

*s/ Donald G. Wilkerson*  
**DONALD G. WILKERSON**  
**United States Magistrate Judge**