

**Beatriz Rhoades**  
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November 10, 2009

By Fax: (412)208-7357  
Donetta W. Ambrose, Chief Judge  
Court's Chambers  
United States District Court  
Western District of Pennsylvania

RE: **Beatriz Rhoades v. YWCA of Greater Pittsburgh**  
U.S.D.C. Western District of PA No. 09-0261  
Reconsideration Court Order dated October 14, 2009

Honorable Chief Judge Donetta W. Ambrose:

Plaintiff Beatriz Rhoades respectfully is asking to your Honorable Court for a Reconsideration Court Order dated October 14, 2009 regarding Plaintiff's motion to compel. Plaintiff would like to have a conference call on Wednesday, November 11, 2009 at 9:00 AM to discuss this matter if the Chief Judge Donetta W. Ambrose approved it.

Second Set: Document request 2

Provide Ceridian report called: Employees Witt No Lateness by Department from 01/01/2002 to date.

Court Order dated 10/14/2009 states: "Defendants objects that this request is vague and that the information sought is irrelevant. I agree with defendant that this request is vague in that it is difficult to discern what Plaintiff is asking for with this request. Accordingly, Plaintiff's motion to compel will be denied as to request 2".

This is a report already set up in Ceridian system; it is easy to run it. Plaintiff has been accused of being late. This report showed exempt and non exempt employees with no lateness. This report is important for Plaintiff to support her claims.

Second Set: Document Request 19, 20

Court Order dated 10/14/2009 states: Considering that the YWCA of Greater Pittsburgh has existed for around 140 years and Plaintiff does not specify a time frame in which she is seeking information relating to prior charges of discrimination and

retaliation, this request is unduly vague and burdensome. Plaintiff's motion to compel is denied as to these requests.

Plaintiff's Second Set of Interrogatories, Request for Production of Documents and Admissions to defendant YWCA II. Instructions Q. states: Unless stated otherwise, the time period covered by this Discovery request is January 1, 2002 to date. (Please see page # 5).

First Set: Document Request 2; Second Set: Document Request 4

Court Order dated 10/14/2009 states: request 2 (First Set) and 4 (Second Set) ask Defendant to produce all employee personnel files for employees hired and/or terminated by Barbara Manning, Valerie Wheatley, Lillian Young, and Dena Davis from January 1, 2002 to present. These requests are unduly broad and burdensome. Relevant information can be obtained through First Set of Interrogatories 8,9,10, 16,17,18,34,35; First Set of Document request 3,4,5,13,14,15,16,18,22,23,27 and 31; and Second Set of Document request 13.

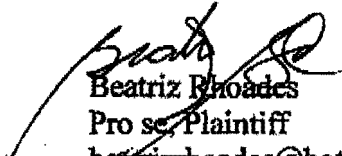
Request 2 (First Set) and 4 (Second Set) are a valuable information to see a pattern of discrimination on each one of the individual defendant Valerie Wheatley, Barbara Manning, Lillian Young and Dena Davis. A pattern of discrimination that it is not shown on First Set of Interrogatories 8,9,10, 16,17,18,34,35; First Set of Document request 3,4,5,13,14,15,16,18,22,23,27 and 31; and Second Set of Document request 13.

First Set: Document Request 6,7,8,9, and 10; Second Set: Document Request 5, 6, 7,8,14

Request 6,7,8,9,10 (First Set) and request 5,6,7,8,14 (Second Set) request copy of emails. The emails will provide important information to support Plaintiff claims.

Wherefore, Plaintiff respectfully requests that the Court order Defendant YWCA of Greater Pittsburgh to provide the responses to Second Set: Document request 2, 4, 5, 6, 7, 8, 14, 19, and 20; First Set: Document Request 2, 6,7,8,9, and 10.

Respectfully submitted,



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By email

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# Fax

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From: Beatriz Rhoades

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Pages: Cover+2 pages

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