

September 22, 2005

The Honorable Common Council
of the City of Milwaukee
City Hall – Room 205

Re: Resolution to authorize settlement of lawsuit entitled Stacy Lopez v. *City of Milwaukee*
ERD Case No. CR200303860, and EEOC Case No. 26GA4000061

Dear Council Members:

Enclosed please find a resolution authorizing settlement of the above captioned litigation.

On October 9, 2003 Stacy Lopez filed a case alleging discrimination based on gender or sex and retaliation.

Ms. Lopez is a member of a protected class under the Wisconsin Fair employment Act and Title VII of the Civil Rights Act of 1964, as amended. Ms. Lopez specifically alleges that she was subjected to disparate treatment in regard to terms and conditions of employment and was subjected to discrimination based upon retaliation.

In consideration of the payment to Ms. Lopez of the gross sum of \$52,000.00, she agrees to withdraw her discrimination case filed in the Equal Rights Division of the Wisconsin Department of Workforce Development and the United States Equal Employment Opportunity Commission. By terms of this agreement the claim is to be withdrawn.

The parties have entered into a settlement in order to avoid further litigation. The settlement resulted from a mediation conducted in the Equal Rights Division. Under the terms of the settlement, Stacy Lopez and Sally Piefer, her attorney, will receive a total of \$52,000.00 to cover any and all claims that could have been brought, including back pay, compensatory damages, lost benefits, attorney fees, and costs. The settlement does not include possible worker's compensation claims. There is no admission of liability.

Hon. Common Council
September 22, 2005
Page 2

The City Attorney believes settlement is in the best interests of the City and therefore recommends settlement of the pending case.

The City Attorney requests that the Committee to which this matter is referred convene in closed session for purposes of discussing the terms of the settlement, and the underlying litigation.

Very truly yours,

GRANT F. LANGLEY
City Attorney

LEONARD A. TOKUS
Assistant City Attorney

LAT:enm
enclosures
96457/1032-2003-3451