

**IOWA DISTRICT COURT, POLK COUNTY – NOTICE OF CLASS ACTION  
PIPPEN *ET AL.* V. STATE OF IOWA *ET AL.* – CASE NO. CL 107038 (CONSOL.)**

**IF YOU ARE AN AFRICAN AMERICAN WHO APPLIED FOR  
OR HELD A MERIT POSITION IN IOWA’S EXECUTIVE BRANCH  
READ THIS NOTICE CAREFULLY – IT AFFECTS YOUR RIGHTS.**

- A group of African American Plaintiffs identified on the back of this page are suing the State of Iowa and Executive Branch agencies for race discrimination in hiring and promotion and related unequal terms and condition of employment (for more, see [www.iowagovraceclassaction.info](http://www.iowagovraceclassaction.info)).
- On September 28, 2010, the Court ruled the lawsuit can be maintained as a class action as to the following class and class claims:

**CLASS DEFINITION:** All African American applicants or employees who sought appointment to or held a merit-system position with an Executive Branch agency (not including Board of Regents) at any point from July 1, 2003 through [date of Court’s decision regarding liability].

**CLASS CLAIM:** Disparate Impact or Adverse Impact discrimination with respect to hiring and promotion decisions and/or unequal terms and conditions of employment associated with those decisions under Title VII and the Iowa Civil Rights Act arising from subjective, discretionary decision-making permitted by the State’s abdication of statutory or regulatory responsibilities and obligations and/or failure to follow its own policies.

- The Court appointed the following attorneys as Class Counsel: Thomas A. Newkirk, Michael J. Carroll, J. Bryan Wood (all co-Lead Counsel), Katie Ervin Carlson, and David H. Goldman.
- The judgment in this lawsuit, whether favorable or unfavorable, will bind everyone covered by the class definition. The lawsuit seeks all relief available under Title VII and the Iowa Civil Rights Act, including but not limited to back pay, front pay, emotional distress damages and equitable and injunctive relief necessary to address alleged systemic discrimination in the Executive Branch. The State has not asserted any counterclaims.
- You have the right to appear in the class action either personally or through counsel, but you do not need to do anything to protect your ability to obtain relief on the class claims. If you appear individually, you may be liable for costs assessed against the class.
- Many other types of claims, including claims relating to disparate treatment race discrimination and retaliation, are not being certified as a class claim. The time for you to pursue non-class claims may have been suspended, but any applicable tolling will expire on **January 27, 2011** absent action by you. You must act to protect any rights you have relating to non-class claims.

**THIS NOTICE ONLY EXPLAINS YOUR RIGHTS – IT IS NOT AN EXPRESSION OF ANY  
OPINION BY THE COURT REGARDING THE MERITS OF ANY CLAIMS.**

**Questions?** Call (515) 309-6994, e-mail [classaction@newkirklaw.com](mailto:classaction@newkirklaw.com), contact Newkirk Law Firm, P.L.C., 515 E. Locust Street, Ste. 300, Des Moines, IA 50309 or Babich Goldman, P.C., 100 Court Avenue, Ste. 403, Des Moines, IA 50309, visit [www.iowagovraceclassaction.info](http://www.iowagovraceclassaction.info) or attend an information session at Newkirk Law Firm on January 15, 2011 at 10:30 a.m.

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<b>PLAINTIFF</b>	<b>ADDRESS</b>
Baxter, Frank	603 25 <sup>th</sup> Street Se, Altoona, IA 50009
Bowman, Steven	P.O. Box 2248, Ames, IA 50010
Brown, Rufus	405 E. 6 <sup>th</sup> Street, Apt. 5, Ames, IA 50010
Brown, Sandra	835 Walden Chase Lane, Columbus, GA 31909
Brown, Terry	3605 NW 83 <sup>rd</sup> Place, Ankeny, IA 50023
Carter, Aaron	3820 11 <sup>th</sup> Street, Des Moines, IA 50313
Clark, Denise	1410 E. 9 <sup>th</sup> Street, Apt. 6, Des Moines, IA 50316
Couch, Beverly	1260 Office Park Road, #15, West Des Moines, IA 50265
Devine, Wilbur, Jr.	840 Oak Leaf Lane, Waukee, IA 50263
Ellis, Renaldo	1513 Se Delaware Avenue, #2, Ankeny, IA 50021
Greene, Michael	909 Viburnum Road, #204, Odenton, MD 21113
Hall, Inger	P.O. Box 1492, Des Moines, IA 50309
Henderson, Sandy	732 25 <sup>th</sup> Street, Des Moines, IA 50312
Hudson, Kenneth	P.O. Box 156, Cedar Falls, IA 50613
Jackson, Raymond	3409 Brook Ridge Court, Des Moines, IA 50317
Jefferson, Tereasa	3714 Skyline Drive, Des Moines, IA 50310
Jones, Dennis	2901 Summit Vista Drive, Des Moines, IA 50321
Lamay, Sharon	2624 Rollins Avenue, Des Moines, IA 50321
Leflore, Carter	P.O. Box 1572, Cedar Rapids, IA 52404
Leflore, Violet	110 Jacolyn Drive, #6, Cedar Rapids, IA 52404
Lewis, Sonia	P.O. Box 8184, Des Moines, IA 50301
Norwood, Crawford	15228 Alpine Drive, Urbandale, IA 50323
Parker, Denise	4017 81 <sup>st</sup> Street, Urbandale, IA 50322
Pippen, Linda	250 Kelso Lane, Fairfax, IA 52228
Polk, Dorothea	1605 E. 12 <sup>th</sup> Street, Des Moines, IA 50316
Shook, Shane	P.O. Box 8212, Des Moines, IA 50301
Shook, Ylonda	P.O. Box 8212, Des Moines, IA 50301
Simmons, Robert	1261 73 <sup>rd</sup> Street, Windsor Heights, IA 50324
Smith, Mary	2905 E. 22 <sup>nd</sup> Court, Des Moines, IA 50317
Traywick, Mary	253 Boston Avenue, Waterloo, IA 50703
Zanders, Charles	4104 158 <sup>th</sup> Circle, Urbandale, IA 50323

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