

Questions for Lilly Class Members

This form is intended only for individuals seeking advice, counsel and/or representation from Rose & Rose, P.C. As such, the information you provide is protected by the Attorney Client privilege. We will use your name only if you give us permission (see #8)

Please email response to SHudson@roselawyers.com.

Please provide as much of the following information as you can. If the form seems too long or you are not sure about participating, you can always supplement the details later.

At a minimum, we need your contact info, positions at Lilly, and a brief description of the kind of discrimination you have suffered with dates when you have been paid less, passed over for promotion etc.

We can seek damages for discrimination going back to April 2002. Earlier incidents (particularly co-workers who have moved ahead of you) are relevant background.

1. Name
2. Address
3. Phone (day)
(Evening)
4. E-Mail
5. Race
6. Date of Birth
7. Gender

8. DO YOU WANT TO BE NAMED IN THE LAWSUIT? We can only seek money for people who identify themselves at some point. We will, however, attempt to assert the claims of unnamed class members. So you can wait and see whether we get the class certified and prove a class wide case. If you are unsure, provide a summary of your story and the lawyers will contact you if it looks like your testimony will be helpful in proving the class claim.

You should be aware that it is a violation of federal law for an employer to retaliate against an employee for asserting a Title VII claim. While we cannot guarantee a lack of retaliation, defense counsel will undoubtedly tell the company to avoid any conduct that looks remotely like retaliation.

 - a. Yes
 - b. No
 - c. Not sure/not yet

9. Degrees obtained and/or other relevant training (please provide dates)

10. Employment experience before and/or after Lilly

11. Date(s) of hire with Lilly

12. If you have been terminated or resigned, please give date and circumstances [terminated due to, resigned due to]
13. Positions held with Lilly (job title, work location and functional sector of the company, dates in each position)
14. Date of your last promotion or non-cola raise
15. Salary grade(s), base pay and % of range since April 2002
16. Have you filed an external EEOC or Indiana Human Rights Commission charge? If so, date of submission? Is the investigation ongoing? Date of receipt of any right to sue letter?
17. Have you signed a settlement or release of your EEO claims in exchange for money or a job? If so, explain why the release would not be binding (e.g. new discrimination has occurred after the date of the release)
18. Please state generally how you have been rated over the past 5 years and note any awards, commendations or discipline or criticism of your work and abilities. If a change of managers is behind a problem, please explain.
19. Please describe in detail why you believe you are a victim of race discrimination in pay, promotions, assignments or other important conditions of employment at Lilly. The following are some indicators:
 - a. Are there white co-workers who started with credentials similar to yours who have been groomed and promoted while you have not? If so, provide as many names and details as you can. Also, state whether there are white peers with similar credentials and tenure who remain in the same pay level as you.
 - b. Are there white co-workers performing job functions similar to yours who are paid more (e.g. was your predecessor in the job paid at a higher level; another person doing the same work? Provide names and details.
 - c. Have you requested equal treatment (e.g. the job assignments that lead to promotions; an opportunity to post for better positions; a pay increase to match your white peers; a grade increase to reflect your job duties) Provide details.

- d. Have you raised the equal pay/promotions issue with internal EEO? Provide details.
 - e. Have you suffered retaliation for raising equal treatment issues?

 - f. Have you been ostracized, rated badly, denied assignments, been unfairly rated, encouraged to leave or otherwise mistreated for reasons that can only be explained by race and/or retaliation (e.g. race based comments; refusal to provide training provided to whites; statements that you are not the right look for this office or that you don't have promotion potential etc. . .)- provide details.
20. If you have other information that you believe will help support this case, please describe it.
21. Are you a member of the NAACP?