

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT

_____	)	
U.S. EQUAL EMPLOYMENT	)	
OPPORTUNITY COMMISSION,	)	
Plaintiff,	)	
	)	
ESTATE OF JENNIE PICKETT LUMBRA,	)	
Plaintiff-Intervenor,	)	
	)	
STATE OF VERMONT,	)	Case No. 2:21-cv-00099-wks
Plaintiff-Intervenor,	)	
	)	
v.	)	
	)	
COUGHLIN, INC., D/B/A MCDONALD’S,	)	
Defendant.	)	
_____	)	

**JOINT MOTION TO APPROVE CONSENT DECREE**

Plaintiff United States Equal Employment Opportunity Commission (“EEOC”), Plaintiff-Intervenor the State of Vermont, Plaintiff-Intervenor the Estate of Jennie Pickett Lumbra, and Defendant Coughlin, Inc. (“Defendant”) (collectively, the “Parties”), jointly move, through their undersigned counsel, that this Court APPROVE the attached Consent Decree, which has been signed and approved by the Parties. The signed Consent Decree is attached hereto as Exhibit 1. The Consent Decree states that the Court shall retain continuing jurisdiction to enforce the provisions of the Decree.

WHEREFORE, the Parties jointly respectfully request that the Court GRANT their motion.

Date: June 16, 2022

Respectfully submitted,

/s/ Cara B. Chomski

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Date: June 16, 2022

Respectfully submitted,

/s/ Emily C. Adams

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Date: June 16, 2022

Respectfully submitted,

/s/ James G. Levins

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JAMES G. LEVINS  
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Date: June 16, 2022

Respectfully submitted,

/s/ Kendall Hoechst  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 16, 2022, I electronically filed the foregoing with the Clerk of the District Court using its CM/ECF system, which then electronically notified all those registered as CM/ECF participants in this case.

/s/ Cara Chomski  
Cara Chomski