

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS**

**U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,**

Plaintiff,

v.

RENT-A-CENTER EAST, INC.,

Defendant.

No. 16-CV-2222

Magistrate Judge Eric I. Long

**DEFENDANT RENT-A-CENTER EAST, INC.'S DEPOSITION DESIGNATIONS AND
OBJECTIONS TO PLAINTIFF'S DEPOSITION DESIGNATIONS**

In accordance with the Court's order at the Pretrial Conference, Defendant Rent-A-Center East, Inc. ("RAC") files the following deposition designations, highlighted copies of which are being contemporaneously delivered to chambers via email per a joint submission with the EEOC:

1. November 8, 2017 Deposition of Maria Clatterbuck

4:2-5:13; 5:21-9:14; 9:21-10:25; 11:14-16; 11:18; 11:20-12:20; 12:22-25; 13:3-5; 13:7-25; 13:19-16:12; 16:14-19:20; 19:22-23; 20:1-21; 21:3-24; 22:1-9; 22:11-18; 22:20-23:4; 23:6-9; 23:23-24:10; 24:12-25:1; 25:18-23; 26:1-8; 26:10-23; 26:25-27:5; 27:7-10; 27:12-16; 27:18-24; 28:1-6; 28:8-10; 28:12-21; 28:23-29:5; 29:7-14; 29:16-23; 30:1-8; 30:10-14; 30:16-22; 30:24-31:5; 31:7-14; 31:16-23; 31:25-32:7; 32:9-19; 32:22

2. June 12, 2017 Deposition of Marcy Bussman

4:23-5:7; 6:20-7:4; 8:5-12; 8:19-9:10; 10:3-11:14; 11:18-12:5; 12:19-13:3; 13:10-16; 15:1-3; 16:14-17:4; 17:13-19:8; 20:14-21:6; 26:13-16; 26:20-27:2; 29:15-19; 31:1-22; 32:18-22; 33:2-35:1; 35:6-14; 35:23-36:9; 36:15-23; 37:3-39:18; 39:24-40:2; 40:8-17; 41:3-22; 42:20-43:6; 46:12-24; 48:9-49:7; 50:12-53:14

3. May 23, 2017 Deposition of Mary Ann Kelly

7:16-20; 8:3-16; 8:21-9:4; 10:5-11:23; 12:2-22; 13:3-5; 15:23-16:5; 16:21-17:3; 18:2-19:1; 20:8-10; 20:17-21:20; 21:22-22:16; 23:4-7; 23:22-24:5; 29:2-13; 31:25-32:13; 37:3-38:2; 38:22-39:7

4. April 21, 2017 Deposition of David Leavengood

4:1-13; 4:22-5:5; 6:7-9; 6:15-20; 6:23-24; 7:6-17; 7:21-8:2; 8:13-16; 8:22-9:5; 9:9-23; 13:3-14:10; 15:9-14; 15:18-17:24; 23:23-24:8; 27:6-9; 27:11; 27:13-28:20; 30:20-31:15; 32:10-19; 34:20-35:18; 36:3-23; 37:3-11; 41:3-11; 44:2-5; 46:19-48:14; 51:22-53:5; 53:7; 55:19-56:13; 56:16-20; 57:4-9; 58:9-19; 63:13-20; 64:10-21; 66:15-67:1; 68:2-12; 69:20-70:1; 70:17-22; 71:11-22; 73:3-13; 73:16-18; 73:21-22; 73:24-74:1; 74:3-4; 74:15-75:6; 75:8-9; 76:19-77:2; 77:5-7; 77:16-24; 78:5-7; 78:9-16; 79:7-12; 79:14; 80:3-8

5. October 25, 2017 Deposition of Frank Piekarski

4:8-10; 4:20-5:10; 5:14-16; 6:9-22; 7:5-13; 8:4-9:19; 10:13-11:5; 12:10-12; 12-18-24; 15:3-12; 16:18-20:10; 22:20-24:20

6. June 9, 2017 Deposition of Daniel Roling

4:5-22; 5:4-7; 5:10-11; 6:6-21; 8:5-14; 8:19-9:4; 9:7-10:16; 12:11-17; 12:20-14:3; 14:13-17:16; 19:5-20:7; 20:19-21:2; 21:4-13; 21:16-20; 21:24-22:2; 22:6-15; 23:8-17; 23:22-24:8; 25:5-10; 26:1-14; 28:2-20; 33:14-34:1; 34:21-35:2; 36:12-37:14; 39:12-16; 39:22-40:19; 43:15-22; 44:3-10; 46:9-14

7. November 8, 2017 Deposition of Marissa Torres

4:6-8; 5:22-6:25; 9:10-17; 25:1-9; 53:5-54:5; 54:16-25; 58:16-61:5; 61:9; 61:13-25; 62:7-63:9; 73:15-74:7; 74:9-17

8. May 22, 2017 Deposition of Russell Wiedemann

5:1-20; 6:10-7:1; 7:20-8:2; 10:17-13:20; 13:22-14:5; 14:12-13; 14:18-25; 15:3-23; 16:14-19; 16:23-17:18; 17:24-18:18; 18:24-19:10; 19:12-22; 20:13-18; 20:20-25; 21:2-4; 21:12-19; 21:24-22:1; 22:8-23:8; 23:12-14; 23:16-18; 23:20-24:4; 24:7-13; 24:15; 24:24-25:14; 26:20-27:2; 27:4; 27:8-29:1; 32:1-3; 32:5-14; 32:24-33:3; 33:5-34:2; 34:8-19; 34:22-35:2; 36:18-20; 36:22-37:5; 37:8-40:16; 41:9-12; 41:14-24; 42:18-24; 43:17-25; 44:5-9; 46:20-47:5; 47:19-21; 47:24-24-48:14; 50:11-52:2; 52:4-5

Defendant further files its objections to Plaintiff's deposition designations as follows:

Deponent	Page/Line	Objection
Dan Roling	31:1-13, 17-19; 32:1-4, 15-21	Relevance
Dan Roling	42:10-17	Lack of foundation, calls for speculation

Marisa Torres	31:3-13	Lack of foundation, calls for speculation
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Respectfully submitted,

/s/ J. Bradley Spalding

J. Bradley Spalding, Texas Bar No. 00786253

J. Bradley Spalding
Texas Bar No. 00786253
LITTLER MENDELSON, P.C.
1301 McKinney Street, Suite 1900
Houston, Texas 77010
713.652.4731

Helene Wasserman
California Bar No. 130134
LITTLER MENDELSON, P.C.
633 West Fifth Street, 63rd Floor
Los Angeles, CA 90071
213.443.4288

Andrew Trusevich
Texas Bar No. 00785119
RENT-A-CENTER, INC.
5501 Headquarters Drive
Plano, Texas 75024
972.801.1465

Dated: January 26, 2018

CERTIFICATE OF SERVICE

I, **J. Bradley Spalding**, an attorney, certify that I served the attorney of record named below with a copy of **Defendant's Deposition Designations and Objections to Plaintiff's Deposition Designations** via ECF (*Electronic Case Filing*) on January 26, 2018:

Miles Shultz
Justin Mulaire
James L. Lee
Gwendolyn Young Reams
Gregory M. Gochanour

U.S. Equal Employment Opportunity Commission
500 West Madison Street, Suite 2000
Chicago, IL 60661
(312) 869-8045
miles.shultz@eeoc.gov

U.S. Equal Employment Opportunity Commission
131 M. Street, N.E.
Washington, DC 20507

J. Bradley Spalding

J. Bradley Spalding