

**From:** [M.ROBERTS-EFILEBOX](#)  
**To:**  
**Cc:**

*Redacted*

**Subject:** [EXTERNAL] RE: HECAPS Submission: McConnell v USPS Class Action  
**Date:** Tuesday, April 9, 2019 9:08:22 AM

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Counsel's request is GRANTED in part.

Counsel will have an extra 90 days in which to respond to the Agency's disputed claims.

So ORDERED

Monique J. Roberts-Draper  
Administrative Judge  
Equal Employment Opportunity Commission  
*Redacted*

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**From:** Jeremy Wright *Redacted*  
**Sent:** Saturday, April 06, 2019 4:45 PM  
**To:** M.ROBERTS-EFILEBOX *Redacted*  
**Cc:** *Redacted*

**Subject:** Re: HECAPS Submission: McConnell v USPS Class Action

Judge Roberts-Draper:

First, we greatly appreciate your fast reply. In answer to your question, we are in the process of preparing claim submissions for over 25,000 individual claimants. A more precise number will be provided on April 15, 2019, in accordance with your Order dated March 20, 2019.

By way of brief explanation, on April 1, 2019, the Agency provided us with a list of approximately 3,000 individual claimants who (allegedly) indicated affirmatively that they are

not represented by our law firms. The next step in the process is for us to contact these claimants to obtain from them a clear designation of representation (or otherwise determine their choice of representation). (For better or worse, hundreds of claimants within this group do not use email.) We will provide an update on April 15, 2019 regarding this step in the process.

After that issue of representation is clarified, we will have a more precise tally for the number of individual claimants for whom we are preparing claim submissions. In the meantime, we have been receiving an extremely large volume of evidence from claimants we represent, related to their claims.

Of note, we have received inquiries from many claimants who have expressed worry (and, in some cases, open panic) that the 20-day deadline for claim submission will pass before our two law firms have had a reasonable amount of time to process the enormous volume of documents (over 500,000 pages) provided to us in connection with these individual claims. Accordingly, we respectfully request a determination as soon as possible regarding our deadline for submitting claim documentation.

We greatly appreciate your efforts to push this process forward as fast as possible. Our law firms have added extraordinary resources in order to accomplish this. Given the large number of individual claimants represented by our law firms, and the unprecedented volume of documents needing to be processed by our law firms prior to claim submission, we believe that an extension of 180 days is appropriate, and supported by abundant good cause. Thank you in advance for your prompt consideration of this request.

Respectfully submitted,

Jeremy Wright

*Redacted*

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**From:** M.ROBERTS-EFILEBOX

*Redacted*

**Sent:** Friday, April 5, 2019 4:55 PM

**To:** Jeremy Wright; M.ROBERTS-EFILEBOX

**Cc:**

*Redacted*

**Subject:** RE: HECAPS Submission: McConnell v USPS Class Action

Counsel,

I do not disagree with your argument that compilation of these documents will take time and I am inclined to grant you the necessary time to do so. My only issue is if there is still an outstanding

question as to which claimants you actually represent, to which claims are you preparing responses?

Monique J. Roberts-Draper  
Administrative Judge  
Equal Employment Opportunity Commission  
*Redacted*

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**From:** Jeremy Wright *Redacted*  
**Sent:** Friday, April 05, 2019 11:20 AM  
**To:** M.ROBERTS-EFILEBOX *Redacted*  
**Cc:** *Redacted*

**Subject:** HECAPS Submission: McConnell v USPS Class Action

EEOC Hearing No. 520-2010-00280X

Agency Case No. 4B-140-0062-06

Administrative Judge Monique Roberts-Draper

Names of Parties: Sandra M. McConnell, et al., v. U.S. Postal Service

Sender: Jeremy D. Wright

Sender's Contact Info:

*Redacted*

*Redacted*

Document Submitted: Reply in Support of Motion for Extension of Time to Submit Claimant Statements, proposed order.

Jeremy Wright

*Redacted*