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7
8 Attorneys for Petitioner, CCRD

(Fee Exempt, Gov. Code, § 6103)

9
10 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **IN AND FOR THE COUNTY OF ALAMEDA**

12 CALIFORNIA CIVIL RIGHTS
DEPARTMENT (FORMERLY KNOWN AS
13 THE DEPARTMENT OF FAIR HOUSING
AND EMPLOYMENT), an agency of the
State of California,

Petitioner,

15 vs.

16 JPMORGAN CHASE BANK, N.A.

17 „

18 Respondent.

Case No. 22CV012663

STIPULATED JUDGMENT

[Cal. Code of Civ. Proc., § 664.6]

19
20 Petitioner, the California Civil Rights Department (formerly known as the Department of
21 Fair Employment and Housing) (hereinafter “Petitioner” or “Department”), and Respondent,
22 JPMorgan Chase Bank, N.A., (hereinafter “Respondent”), hereby stipulate for dismissal of the above
23 action and for entry of this Stipulated Judgment.

24 **STIPULATIONS**

25 1. The Department is charged with enforcement of, inter alia, California Government
26 Code section 12999, requiring large employers to report pay data to the Department on an annual
27 basis.



1 2. Respondent is a national association with its principal place of business at 1121
2 Polaris Parkway, Columbus, OH 43240.

3 3. Respondent is a consumer bank with more than 900 branches in California.

4 4. The parties to this action (“Parties”), for the limited purposes of ordering dismissal of
5 the Petition, agree that this Court has jurisdiction over the subject matter and the Parties, venue is
6 proper in this County, and this Court has jurisdiction to enter this Order.

7 5. This Order is entered to resolve the Petition for an Order Compelling Compliance
8 with Government Code Section 12999, Obligating Employers to Submit Pay Data Reports, and
9 Request for Costs.

10 6. Government Code section 12999, which was enacted in 2020 with an effective date of
11 January 1, 2021, requires each employer that is subject to the Fair Employment and Housing Act,
12 with at least 100 employees nationwide, and that is required to file an Employer Information Report
13 (“EEO-1”) under federal law, to submit a pay data report to DFEH on an annual basis.

14 7. Respondent is an employer with at least 100 employees nationwide, is subject to the
15 Fair Employment and Housing Act, and is required to file an Employer Information Report under
16 federal law. Nothing in this Stipulated Judgment shall preclude Respondent from asserting any and
17 all available defenses to any claims under the Fair Employment and Housing Act or otherwise.

18 8. California’s pay data report law requires employers to provide the number of
19 employees by race, ethnicity, and sex in certain job categories and by category of rate of pay they
20 employed during the previous year. Government Code section 12999 requires that employers submit
21 a pay data report on or before March 31st of each year with pay data from the prior year (“Reporting
22 Year”). The first such report was due March 31, 2021, for the 2020 reporting year.

23 9. Respondent filed its 2020 pay data report with DFEH on June 24, 2022.



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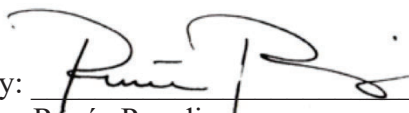
Stipulated Judgment.

DATED: August 26, 2022

CALIFORNIA CIVIL RIGHTS DEPARTMENT


NELSON CHAN
Assistant Chief Counsel

RENEE PARADIS
Associate Chief Counsel

By: 
Renee Paradis
Attorney for the Department

DATED: August 26, 2022

MCGUIREWOODS LLP

By: 
Molly M. White
Attorney for JPMorgan Chase Bank, N.A.

JUDGMENT IS ENTERED THIS DATE IN ACCORD WITH THE ABOVE.

DATED: _____
HON. FRANK ROESCH

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

3 I am employed in the County of Los Angeles, State of California. I am over the age of
4 eighteen years and not a party to the within action; my business address is 1800 Century Park
East, 8th Floor, Los Angeles, CA 90067-1501.

5 On August 26, 2022, I served the following document(s) described as **STIPULATED**
6 **JUDGMENT** on the interested parties in this action by placing true copies thereof enclosed in
sealed envelopes addressed as follows:

7 Nelson Chan
8 Renee Paradis
9 California Civil Rights Department
10 2218 Kausen Drive, Suite 100
11 Elk Grove, CA 92758
916.478.7251
888.382.5293 (Fax)
Nelson.Chan@dfeh.ca.gov
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Attorneys for Petitioner
CALIFORNIA CIVIL RIGHTS
DEPARTMENT

12 Molly M. White
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14 1800 Century Park East, 8th Fl.
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Attorneys for Respondent
JP MORGAN CHASE BANK, N.A.


15 **BY MAIL:** I am “readily familiar” with the firm’s practice of collection and processing
16 correspondence for mailing with the United States Postal Service. Under that practice, it
17 would be deposited with the United States Postal Service that same day in the ordinary
course of business. Such envelope(s) were placed for collection and mailing with postage
thereon fully prepaid at Los Angeles, CA, on that same day following ordinary business
practices. (C.C.P. § 1013 (a) and 1013a(3))

18 **BY E-MAIL:** By electronic mail transmission via Electronic Filing Service Provider One
19 Legal by transmitting a PDF format copy of such document(s) to each person at the email
addresses set forth on the above service list.

20 **BY HAND DELIVERY:** I delivered such envelope(s) by hand to the office of the
21 addressee(s). (C.C.P. § 1011(a)(b))

22 I declare under penalty of perjury under the laws of the State of California that the
foregoing is true and correct.

23 Executed on August 26, 2022, at Los Angeles, CA.

24
25 
26 Sherlynn Hicks