

RECEIVED

OCT 10 2001

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

COPY

FERMIN COLINDRES, LAZARO GARCIA, §
ECTOR LOPEZ, JOSE A. MARQUEZ, §
FERNANDO GONZALEZ, §
JUAN CASANOVA, and others similarly §
situated, §

Class Action

Plaintiffs,

v.

Civil Action No.

QUIETFLEX MANUFACTURING CO., LP, §
and its GP QUIETFLEX HOLDING CO., §
& §
GOODMAN MANUFACTURING CO., §
LP d/b/a §
QUIETFLEX MANUFACTURING CO., LP §
and its GP GOODMAN HOLDING CO. §

SA 01 CA 0925 EP

Defendants.

COMPLAINT

Plaintiffs bring this class action against Quietflex Manufacturing Company, L.P., its general partner Quietflex Holding Company (collectively "Quietflex"), Goodman Manufacturing Company, L.P., d/b/a Quietflex Manufacturing Company, LP, and its general partner Goodman Holding Co. (collectively "Goodman") under federal laws prohibiting discrimination in employment on the basis of national origin. Plaintiffs allege:

I.
JURISDICTION AND VENUE

1. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1343(a)(4), 2201, and 2202, Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000(e) *et seq.*, as amended, the Civil Rights Act of 1991, and 42 U.S.C. § 1981.
2. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(b) and 42 U.S.C. § 2000-5(f)(3).

II.
INTRODUCTION

3. This is a class action for declaratory and injunctive relief, equitable monetary relief and damages brought by current and former Latino employees of Quietflex and Goodman on behalf of themselves and other Latino employees who have been, and continue to be, adversely affected by Defendants' continuing policy and pattern or practice of discriminatory treatment of their Latino employees on the basis of their national origin.
4. Disregarding the federal law intended to end workplace discrimination, Quietflex and Goodman segregate – and for a decade or longer have segregated – their unskilled workforce. Department 911 is virtually all Latino, while Department 910 has excluded virtually all Latinos. The segregation cannot be explained by job skill differences, because Departments 910 and 911 have exactly the same entry requirements: no skills required. Yet despite worker protests, these two large manufacturers perpetuate the discrimination.
5. Latinos suffer because Quietflex and Goodman systematically pay Latinos in Department 911 less than comparable non-Latino workers in Department 910, even though Latinos work much more difficult jobs. To complete daily piece-work requirements, Latinos in Department

911 must work longer hours, in a much more demanding and harmful environment, with unpaid extra menial duties imposed only on them, and subject to a structure of production quotas, with penalties far worse than non-Latino pieceworkers in Department 910.

6. No one seeks to transfer into the Latino Department (911), but when Latinos seek to transfer into the better Department (910), they systematically have been excluded. Quietflex and Goodman discriminate by imposing an English language fluency requirement for Latinos to transfer, even though they do not require English when initially hiring non-Latino workers for the better job. Moreover, non-Latinos can transfer into Department 910 even when not fluent in English. Indeed – when it suits their production goals – the Defendants assign the better jobs in Department 910 (temporarily) to the very Latinos who cannot obtain the same jobs permanently.
7. On January 10, 2000, approximately eighty Latinos protested the on-going discrimination – and immediately Quietflex and Goodman fired them all. The U.S. Equal Employment Opportunity Commission (“EEOC”) began an investigation after the Latinos promptly filed their Charges of Discrimination. Since then Quietflex and Goodman have authorized a few token transfers for Latinos, but refuse to change the harsh inequalities they systematically still impose. Thus persists the institutionalized segregation and discrimination.
8. On September 29, 2000, the EEOC issued its official determination that Quietflex and Goodman systematically discriminated – intentionally, and using policies and procedures with discriminatory impact – against each of 76 complaining workers from Department 911, including the named Plaintiffs and similarly situated Latinos who worked in the same Department. Plaintiffs bring this class action for themselves and other Latino workers to end

the unlawful conduct and obtain fair compensation for past wrongdoing.

III. PARTIES

Plaintiffs

9. Plaintiffs Fermin Colindres, Lazaro Garcia, Ector Lopez, Jose A. Marquez, Fernando Gonzalez, and Juan Casanova are Latino residents of Texas who have worked for Quietflex and Goodman in Department 911.

Defendants

10. Quietflex Holding Company is a Delaware corporation.
11. Quietflex Holding Company is the general partner of Quietflex Manufacturing Company, L.P., a Texas limited partnership doing business in Texas. Quietflex Holding Company and Quietflex Manufacturing Company are referred to collectively in this complaint as "Quietflex."
12. Goodman Holding Company is a Texas corporation.
13. Goodman Holding Company is the general partner of Goodman Manufacturing Company, L.P., a Texas limited partnership doing business in Texas. Goodman Holding Company and Goodman Manufacturing Company are referred to collectively in this complaint as "Goodman."
14. Goodman Manufacturing Company, L.P. is registered to do business as Quietflex Manufacturing Company in Texas.
15. Goodman and Quietflex operate an air conditioning duct manufacturing facility in Houston, Texas.

16. Quietflex is and has been an employer within the meaning of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e(b). Quietflex has approximately 250 employees.
17. Goodman is and has been an employer within the meaning of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e(b). Goodman has over 8,000 employees throughout its offices located in Texas and several other states.
18. Collectively, Goodman and Quietflex share programs, policies, and procedures that make them an integrated enterprise (“the Company”) and employers within the meaning of Title VII of the Civil Rights Act of 1964.

IV.
FACTS RELATING TO DISCRIMINATION

19. The Company’s discrimination manifests itself by comparison of segregated departments that produce the components of its air conditioning ducts.
20. Department 910 produces cores and jackets for the ducts.
21. Department 911 assembles the core, jacket and fiberglass components to create the final product.
22. The requirements for employment in each of the departments are the same: no experience or skill is necessary for hire into either of the departments.
23. The differences in pay and working conditions in each of the departments is striking.

Channeling and Segregation

24. Defendants maintain a segregated workforce, with Latinos making up the vast majority of employees in Department 911, and comprising virtually none of the workforce in Department 910, which is comprised of almost all workers of Vietnamese origin.

25. Defendants channeled Latinos into Department 911.
26. Defendants systematically initially assign Latinos into Department 911.
27. Defendants systematically refuse to assign Latinos into Department 910.
28. Defendants have systematically maintained the current pattern of segregation since at least the early 1990's.
29. Each of the named Plaintiffs, Fermin Colindres, Lazaro Garcia, Ector Lopez, Jose A. Marquez, Fernando Gonzalez, and Juan Casanova, along with the class they seek to represent, suffered the discriminatory practices described above.

English Language Fluency Requirement

30. Defendants regularly and purposefully assert a requirement of English-language fluency to deny Latinos transfer to more desirable departments, including 910.
31. Defendants do not impose an English language fluency requirement on similarly situated non-Latino employees who do not speak or read English. Many of the Vietnamese employees in Department 910, for example, speak little or no English.
32. The Company has disseminated its English language fluency requirement for Latinos in writing and reinforced it by word of mouth for openings in departments such as 910.
33. The Company deters Latinos who speak little English from seeking transfer to more desirable positions, and use of its English language fluency requirement has a measurable adverse impact against Latinos.
34. Each of the named Plaintiffs, Fermin Colindres, Lazaro Garcia, Ector Lopez, Jose A. Marquez, Fernando Gonzalez, and Juan Casanova, along with the class they seek to represent, was subjected to and suffered the effects of the English language fluency

requirement.

Unequal Compensation and Production Requirements

35. The Company pays less, but imposes the worst working conditions on its Latino employees in Department 911.
36. Defendants pay production workers in Departments 910 and 911 piece rate wages.
37. The Company sets the piece work and production formulas so that Latinos in Department 911 receive lower wages than comparable employees in Department 910.
38. Defendants require Department 911 employees to perform their production quotas with less automation and more physical effort than required of employees in Department 910.
39. As a result of unequal production standards that the Company imposes on Department 911 employees, Plaintiffs must work longer hours to earn wages comparable to those of non-Latino employees in Department 910. Thus, employees in Department 910 can earn a full day's pay in less than eight hours, whereas employees in 911 must work more than eight hours to meet their minimum production quota.
40. The Company requires Latinos in Department 911 to meet minimum production quotas to keep their jobs. Latinos unable to meet these quotas have been fired.
41. Defendants do not require non-Latino employees in Department 910 to meet minimum production quotas; instead, as that work can be accomplished more easily and rapidly, the Company sets a maximum production quota for non-Latinos in Department 910.
42. Each of the named Plaintiffs, Fermin Colindres, Lazaro Garcia, Ector Lopez, Jose A. Marquez, Fernando Gonzalez, and Juan Casanova, along with the class they seek to represent, was subjected to the disparate working conditions, including minimum production

quotas, described above for Latinos.

Most Dangerous Job Assignments

43. The substantial physical demands make working in Department 911 dangerous, especially by comparison to Department 910.
44. Defendants provide Latinos in Department 911 ineffective safety equipment, regularly resulting in injuries to Latinos that could be prevented using equipment that the Company in fact provides to employees in other departments.
45. Defendants subject Latinos in Department 911 to a more dangerous environment than non-Latino employees in Department 910 with regard to air quality and protection from air pollutants.
46. Each of the named Plaintiffs, Fermin Colindres, Lazaro Garcia, Ector Lopez, Jose A. Marquez, Fernando Gonzalez, and Juan Casanova, along with the class they seek to represent, were subjected to the more dangerous and harmful working conditions described above.

Defendants Systematically Require Latinos, Only, To Perform Unpaid Menial Tasks

47. The Company has forced Latinos to perform the most menial tasks – such as cleaning the lunchroom that the whole facility uses – without adequate, or any, compensation.
48. This extra task has subjected Latinos to a longer work day and to a risk of substantial penalty for failing to make their production quotas.
49. Each of the named Plaintiffs, Fermin Colindres, Lazaro Garcia, Ector Lopez, Jose A. Marquez, Fernando Gonzalez, and Juan Casanova, along with the class they seek to represent, were required to perform the menial tasks described above.

Discharge and Retaliation

50. Plaintiffs and members of the proposed class complained many times about the Company's policy of segregation as well as several other discriminatory policies and practices that remain to this day.
51. On January 10, 2000, Plaintiffs protested the Company's discriminatory policies and practices by presenting a list of concerns regarding their working conditions to the Company and by peacefully walking out to the Company parking lot to await further discussion with the Company's president.
52. On or about January 11, 2000 the Company discharged Plaintiffs and other proposed class members after they opposed the Company's systematic discriminatory policies and practices.
53. After they were discharged, Plaintiffs filed charges of discrimination with the EEOC opposing the Company's discriminatory practices.
54. The Company later rehired everyone it had fired, but Plaintiffs have not received pay for that period and have suffered retaliation.
55. In September 2000, the Equal Employment Opportunity Commission (EEOC) concluded an investigation of the Company's discriminatory practices that was prompted after 92 individuals filed charges against the Company.
56. The EEOC found cause to believe that the Company engaged in unlawful employment practices in violation of Title VII of the Civil Rights Act of 1964.
57. On or about September 20, 2001, the EEOC issued Notices of Rights to Sue to Plaintiffs, as well as at least 70 additional individuals who have retained Plaintiffs' counsel and fall within the class Plaintiffs seek to represent in this case.

V.
FACTS RELATING TO POLICY AND/OR PATTERNS
OR PRACTICE OF DISCRIMINATION AGAINST LATINO EMPLOYEES

58. The denials and abridgments of employment rights and opportunities as detailed above, are not isolated examples of the Company's employment practices; rather, they are illustrative of the pervasive policy and/or pattern or practice of national origin discrimination in employment that has continually existed for employees in Department 911. The Company has created and maintained a policy and/or pattern or practice of national origin-based disparate treatment that limits the employment opportunities of Latino employees in the Company's Department 911.
59. The Company continues to maintain a stratified organizational structure according to national origin of its employees, with Anglo employees filling the vast majority of management positions, Vietnamese employees filling the vast majority of positions in Department 910 and Latino employees making up the vast majority of employees in Department 911.
60. The Company has pursued a policy and/or pattern or practice of national origin discrimination on a continuing basis which has had the intent or effect of denying Latinos equal job opportunities and conditions of employment. Such policy and/or pattern or practice include, without limitation:
- a. Failing and refusing to establish a uniform and unbiased process by which non-Latino and Latino employees can apply and compete equally for transfers and promotions;
 - b. Assigning Latino employees to job positions with limited transfer opportunities, while assigning similarly situated non-Latino employees to more desirable positions with greater opportunity for advancement and/or greater pay;
 - c. Creating and maintaining segregated production departments;

- d. Maintaining an English language fluency requirement that excludes Latinos from initial assignment and department transfer to more desirable positions;
- e. Failing and refusing to consider Latino employees for desirable work assignments, transfers and promotions on the same basis as non-Latino employees are considered;
- f. Maintaining and fostering a reputation for discriminatory conduct that deters Latino employees from pursuing promotional opportunities or transfers within the Company;
- g. Paying Latino employees less than similarly-situated non-Latino employees by, for example, setting different production standards;
- h. Threatening and/or taking disciplinary action, including discharge, against Latino employees for not meeting the national origin-based minimum production standards required only of production workers in Department 911;
- i. Denying Latino employees other terms and conditions of employment on the same basis applied to non-Latino employees by, for example, assigned them to clean the lunchroom without compensation, and/or segregating them in a more onerous, dangerous and less remunerative department;
- j. Failing and refusing to take reasonable and adequate steps to eliminate the continuing effects of Quietflex's past discriminatory policy and/or pattern or practice;
- k. Retaliating against Latino employees who protest against Quietflex's discriminatory policy and/or pattern or practice by subjecting them to a hostile work environment, including but not limited to harassment, intimidation, derogatory and demeaning name calling, and subjecting Latino employees to disciplinary action.

VI.
CLASS ACTION ALLEGATIONS

61. Plaintiffs seek class certification of this action under Fed. R. Civ. P. 23 (b)(1), 23(b)(2) and/or 23(b)(3). The class consists of all the Company's current and former Latino employees who worked in Department 911 at any time during the period January 1, 1996 to the present. The class that Plaintiffs seek to certify satisfies the numerosity, commonality, typicality, and adequacy of representation prerequisites for certification under Fed. R. Civ. P. 23(a).
62. The proposed class includes, in addition to the named Plaintiffs, at least 70 additional employees of the Company who filed charges with the EEOC, and who the EEOC found to have suffered discrimination. These additional employees, all represented by undersigned counsel, intend to bring individual discrimination claims if, for any reason, they are not covered by a certified class in this case, or if for any reason a certified class is decertified.
63. The EEOC, in evaluating the claims of the named Plaintiffs and additional proposed class members, found reasonable cause to believe that the Company had discriminated with respect to the individuals who filed charges (including Plaintiffs) and with respect to this above-described class.
64. Plaintiffs are members of the class they seek to represent.
65. Numerosity, Fed. R. Civ. P. 23(a)(1): The members of the class identified in Paragraph 61 above are so numerous that joinder of all members is impracticable. The proposed class includes at least the 76 (represented by undersigned counsel) who complained to the EEOC, much more than enough to satisfy the numerosity requirement of Fed. R. Civ. P. 23(a)(1).
66. Commonality: Fed. R. Civ. P. 23(a)(2): This suit poses numerous questions of law and fact

that are common to and affect the rights of all members of the class. The answers to these questions will be determined on the basis of common evidence that is applicable to each class member -- including proof of Company policies and procedures, and expert testimony, as well as consistent documents and substantial testimony about specific instances that illustrate the persistent patterns and practices of discrimination. Specific examples of factual and legal commonality include, but are not limited to:

- a. Common Questions of Fact. Claims of each Plaintiff and proposed class member implicate common factual questions including (without limitation) the following:
 1. Whether the Company has segregated Latinos in Department 911, and has excluded them from Department 910, which in turn implicates common questions concerning hiring and transfer;
 2. Whether the Company employs different wage formulas for Departments 910 and 911, systematically paying Latinos less than comparable non-Latino workers, even though Latinos in Department 911 must work longer hours, in a much more demanding and harmful environment, with unpaid extra menial duties imposed only on them, and subject to a penalty structure worse than that imposed on non-Latinos in Department 910;
 3. Whether the Company maintains an English-language fluency requirement for Latinos seeking transfer to Department 910, with discriminatory intent or effect; and
 4. Whether the Company retaliated against Plaintiffs and the proposed class on January 2000 by firing protesting workers en masse, and by later harassment

and/or hostile work environment after the filing of the EEOC charge?

b. Common Questions of Law. The claims of all Plaintiffs and the class raise numerous common legal questions relating to their common overarching issue: Whether the Company discriminated against these Latino employees in its facility in its policies and/or pattern and practice based on national origin? The common questions of law include but are not limited to, whether the Company has violated Title VII of the Civil Rights Act of 1964, 42 U.S.C. 2000e et seq., as alleged, under either the disparate treatment or disparate impact theories; whether the Company has violated 42 U.S.C. § 1981; the significance and legal effect of the Company's failure to use objective selection criteria for transfer and/or to have its selection criteria or job requirements validated for job-relatedness; whether the Company's challenged patterns and practices that adversely affect Latino employees can be justified as a "business necessity"; and whether any purported rationale is pretextual.

c. The presence of central questions of fact and law that are common to Plaintiffs and to each class member satisfies Rule 23(a)(2)'s commonality requirement.

67. Typicality: Fed. R. Civ. P. 23(a)(3): Plaintiffs' claims are typical of the claims of the class members as a whole. Plaintiffs possess the same interest and suffer the same injury as the class members. The relief Plaintiffs seek will benefit the class. The claims of Plaintiffs and the class arise out of common facts and similar legal and remedial theories. Plaintiffs and class members share a common interest in assuring that the Company ends its unlawful employment discrimination against Latinos. This shared interest in remedying a shared injury through similar legal and remedial theories satisfies the typicality requirement of Rule

23(a)(3).

68. Adequacy of Representation: Fed. R. Civ. P. 23(a)(4): Plaintiffs and their counsel will fairly and adequately protect the interests of the class. Plaintiffs' interests are coextensive with those of the class. Each plaintiff seeks to end and remedy the Company's national origin discriminatory practices so that Latinos will no longer be segregated in Department 911 or suffer discrimination. Plaintiffs are able and willing to represent the class fairly and vigorously as they pursue this common goal through this action. Plaintiffs' counsel will represent the class fairly and zealously. Plaintiffs' counsel are qualified, experienced, and able to conduct the litigation and meet the time and fiscal demands required to litigate an employment discrimination class action of this size and complexity. The combined interest, experience and resources of Plaintiffs and their counsel to litigate competently the individual and class claims of national origin-based employment discrimination at issue here satisfy the adequacy requirement of Rule 23(a)(4).

69. Federal R. Civ. P. 23(b)(1): The Prosecution of Separate Actions Creates A Risk of Inconsistent Adjudications. Approximately 90 employees filed Charges of Discrimination with the EEOC protesting the Company's policy and/or pattern or practice of treating Latino employees in Department 911 less favorably than their non-Latino counterparts. Each individual plaintiff filed on behalf of him/herself and on behalf of a class of similarly-situated employees of Defendants. The EEOC has issued 80 Notices of Right to Sue to plaintiffs who are represented by undersigned counsel. Without class certification of this case, Plaintiffs will have to proceed individually. With so many individual actions there is a risk of varying adjudications that would require the Defendants to treat Plaintiffs who share common issues

of law and fact differently depending on the results of each litigation. Moreover, adjudications of individual members of the class would as a practical matter would be dispositive of the interests of the other members not parties, especially with respect to the remedial aspects of the cases. Therefore, class certification under 23(b)(1) is proper.

70. Federal R. Civ. P. 23(b)(2): The Company has acted or refused to act in a manner generally applicable to the class. As described in paragraphs 1 through 64 above, the Company maintains a policy and/or pattern or practice of treating Latino employees in Department 911 less favorably than their non-Latino counterparts. This constitutes illegal class-wide disparate treatment in violation of Title VII and Section 1981. The system has resulted in a segregated workforce that provides little or no opportunity for Latinos in Department 911 who do not speak English fluently to advance to more desirable positions. The Company's system of decision-making has resulted in disparate treatment of its Latino employees and has had an disparate adverse impact on Plaintiffs and the class as a whole. These continuing policies and/or patterns or practice are common to and typical of the claims of all Plaintiffs and class members and satisfy Rule 23(b)(2)'s requirement that the Company has acted in a manner generally applicable to the class.

71. Fed. R. Civ. P. 23(b)(2): The Appropriateness of Injunctive and Declaratory Relief to the Class. Plaintiffs seek declaratory relief that the Company's discriminatory employment practices violate federal law; and injunctive relief designed to end and remedy the effect of the Company's ongoing discriminatory practices. Such relief by its nature is applicable to the class as a whole and satisfies Rule 23(b)(2)'s requirement that injunctive and declaratory relief be appropriate.

72. Fed. R. Civ. P. 23(b)(3) Requirements. Class certification is also appropriate pursuant to Fed R. Civ. P. 23(b)(3) in this case because, as set forth in more detail in paragraphs above, common questions predominate over those affecting class members individually, and a class action is superior to other available methods of resolving this controversy. Plaintiffs' counsel represent 76 individuals who belong to the class the named Plaintiffs seek to represent. The alternative to class treatment is certainly numerous individual suits. Such a multiplicity of actions would defeat the economies of scale inherent in the class action procedure and result in substantial waste of judicial resources. Thus, from the standpoint of public policy, transactional costs and judicial economy, multiple litigation would be manifestly inferior to a class action, thereby satisfying Fed. R. Civ. P. 23(b)(3).

VII.
FIRST CLAIM FOR RELIEF

(Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000(e) *et seq.*, as amended)

73. Plaintiffs incorporate Paragraphs 1 through 72.
74. This claim is brought on behalf of all Plaintiffs and the class they seek to represent.
75. The foregoing conduct by Quietflex and Goodman constitutes a pattern or practice of segregation and other unlawful employment policies and procedures, including disparate treatment and impact, all of which violates Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000(e), *et seq.*, as amended, and the Civil Rights Act of 1991.
76. Defendants have engaged in the discriminatory conduct as alleged herein with malice, fraud, and/or in reckless disregard of the rights of Plaintiffs and class members under Title VII. Plaintiffs and class members are thus entitled to recover punitive damages in an amount according to proof.

77. The named Plaintiffs have exhausted their administrative remedies and fulfilled all conditions precedent to filing suit.
78. Plaintiffs request relief as hereinafter provided.

VIII.
SECOND CLAIM FOR RELIEF

(Civil Rights Act of 1866, 42 U.S.C. § 1981)

79. Plaintiffs incorporate Paragraphs 1 through 72.
80. This claim is brought on behalf of all Plaintiffs individually and the class they seek to represent.
81. The foregoing conduct violates the Civil Rights Act of 1866, 42 U.S.C. § 1981.

XI.
JURY DEMAND

82. Plaintiffs demand trial by jury in this action for all issues triable by right.

XII.
PRAYER FOR RELIEF

83. Wherefore, Plaintiffs on behalf of themselves and the class members whom they seek to represent request the following relief:
84. Certification of the case as a class action pursuant to Fed. R. Civ. P. 23 (b)(1), (b)(2) or (b)(3) on behalf of the proposed Plaintiff class and designation of the Plaintiffs as representatives of the class and their counsel of record as Class Counsel;
85. A declaratory judgment that Defendants' patterns and practices are unlawful and in violation of Title VII of the Civil Rights Act of 1964, as amended and 42 U.S. C. §1981;
86. An award of back pay; front pay; damages for lost compensation and job benefits that the individual Plaintiffs and the class they seek to represent would have received but for the

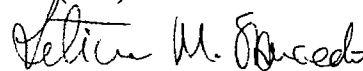
Company's discrimination; and compensatory and exemplary/punitive damages.

87. An order enjoining Defendants from engaging in each of the proven discriminatory practices and requiring the Company to institute and carry out policies, practices and programs that remedy the effect of the Company's past and present unlawful employment practices;
88. Reasonable attorneys' fees and costs and expenses of suit;
89. Prejudgment interest; and
90. Such other and further relief which the Plaintiffs may show themselves to be entitled.

Dated: October 10 2001

Respectfully submitted,

ALBERT H. KAUFFMAN
LETICIA SAUCEDO
NINA PERALES
JOE BERRA
Mexican American Legal Defense and
Educational Fund
The Book Building
140 E. Houston Street, Suite 300
San Antonio, TX 78205
(210) 224-5476
FAX: (210) 224-5382



By: Leticia M. Saucedo
TX State Bar No. 00797381

DAVID A. KAHNE
TX State Bar No. 00790129
Civil Rights and Economic Development
Organization, Co-operating Counsel
P.O. Box 66386
Houston, TX 77266
(713) 652-3966
FAX: (713) 652-5773