

were not in fact secure from reduction or termination during retirement, then Defendants violated ERISA § 102(a) and (b), 29 U.S.C. § 1022(a) and (b), by failing to issue summary plan descriptions which prominently, clearly and accurately disclosed this fact in a manner that could be understood by the average plan participant. During the time period when Plaintiffs and the members of the Class were approaching retirement and electing to retire, Defendants repeatedly issued summary plan descriptions that did not make clear that the subject retiree benefits could be amended or terminated during a participant's retirement, but rather misinformed and misled participants and beneficiaries into believing that they would receive their benefits until death. To the extent that summary plan descriptions made any disclosure about the possibility of amendment or termination of benefits or the plan, Defendants employed vaguely worded and obscurely placed phraseology that did not prominently and clearly disclose the applicability of such potential actions to the benefits of participants who already were retired.

116. If the subject medical, prescription drug and life insurance benefits and subsidies were not in fact secure from reduction or termination during retirement, then each of the fiduciary Defendants also violated ERISA § 404(a), 29 U.S.C. § 1104(a), because each was aware of this highly material fact but misrepresented the terms of the Plans to Plaintiffs and the members of the Class by their misleading failures to clearly and conspicuously disclose this material information about the benefits and/or by affirmatively misrepresenting or strongly implying that these benefits would be provided for the lifetimes of the retirees. Defendants knew (or as reasonable fiduciaries should have known or foreseen) that their conduct in so describing the benefits was false and misleading. Defendants also knew (or as reasonable fiduciaries should have known or foreseen) that the benefits information was important to reasonable employees and retirees, including Plaintiffs and the members of the Class, and was influencing their

important personal decisions such as whether and when to retire, and that Defendants' misrepresentations were confusing them, both before and after retirement, into understanding that their retiree benefits were secure. Defendants intended and expected that Plaintiffs and the members of the Class would have and act on this understanding. Notwithstanding the highly material nature of the benefits information that Defendants misrepresented, Defendants did not act to correct the understanding of Plaintiffs and the members of the Class but instead acted to reinforce their understanding of secure benefits through their continued, pervasive misrepresentations.

117. If the subject medical, prescription drug and life insurance benefits and subsidies were not in fact secure from reduction or termination during retirement, then each of the fiduciary Defendants breached its strict fiduciary duties to Plaintiffs and the members of the Class on a continuing basis by misrepresenting the benefits through their failure to clearly and conspicuously disclose to Plaintiffs and the members of the Class (a) complete, accurate and non-misleading material information regarding the possibility of future adverse changes to their retiree medical, prescription drug, and life insurance benefits, (b) the material information that these benefits were not secure and that changes to the retiree medical, prescription drug, and life insurance benefits were possible and/or were under serious consideration. Defendants also committed related acts of affirmative, uniform misrepresentations about the benefits and concealed material information.

118. In addition, each of the fiduciary Defendants was a "co-fiduciary" and is jointly liable for all breaches committed by each other fiduciary Defendant and each other non-defendant fiduciary, including each Defendant's employees and agents, which misrepresented material information about the benefits, under Section 405 of ERISA, 29 U.S.C. § 1105. Under

this provision, each fiduciary Defendant is liable because each (a) knowingly participated in, or knowingly undertook to conceal, acts or omissions of one or more other fiduciaries regarding the benefits misrepresentations, knowing such acts or omissions were a breach; (b) by the failure to train, supervise and monitor the other fiduciaries, enabled one or more other fiduciaries to commit a fiduciary breach in misrepresenting material benefits information and thereby failing to comply with its own fiduciary duties in the administration of its specific responsibilities to accurately and clearly provide the benefits information; and/or (c) knew of a breach by one or more other fiduciaries in the misrepresentation of material benefits information but failed to make reasonable efforts under the circumstances to adequately correct and cure the misrepresentations and otherwise remedy the breach.

119. As a direct and proximate result of Defendants' violations of their ERISA duties to prepare and distribute understandable summary plan descriptions and their violations of their strict fiduciary duties by misrepresenting and concealing material benefits information, Plaintiffs and the members of the Class have been harmed.

120. Plaintiffs and the members of the Class are entitled to equitable relief to fully remedy Defendants' violations, including an Order enjoining Defendants, and each of them, to reinstate, restore and provide to them the subject retiree medical, prescription drug, and life insurance benefits and subsidies.

121. Plaintiffs and the members of the Class are also entitled to further equitable relief, including entry of an Order requiring an accounting by Defendants of all profits and savings attributable to their fiduciary violations, including all profits and savings resulting from their inducement of early retirements and from elimination of company-paid and subsidized retiree medical, prescription drug and life insurance benefits; disgorgement of all such profits; other

surcharges on Defendants and monetary relief to make Plaintiffs and the members of the Class whole for all losses and harms caused by the fiduciary violations; an award of reasonable attorneys' fees, expenses and costs pursuant to 29 U.S.C. § 1132(g); and such other and further relief as the Court may deem equitable and just

THIRD CLAIM FOR RELIEF

**DECLARATORY RELIEF PURSUANT TO
28 U.S.C. § 2201 AND ERISA § 502(a)(1)(B) and (3), 29 U.S.C. § 1132(a)(1)(B) and (3)**

122. Plaintiffs incorporate paragraphs 1 through 103 by reference as though fully set forth herein, including the above-referenced class allegations.

123. This Claim for Relief is brought on behalf of all Class members against all Defendant Plans, against Defendant Embarq in its capacity as sponsor of these plans, and against fiduciary Defendants Embarq, the Committee, Embarq Mid-Atlantic, CT&T, and Parker in their capacities as Administrators of these plans.

124. This claim is brought under 28 U.S.C. § 2201 and ERISA § 502(a)(1)(B) and (3), 29 U.S.C. § 1132(a)(1)(B) and (3).

125. An actual controversy exists between the parties as follows: Plaintiffs and the members of the Class and VEBA Sub-Class contend that their company-paid and subsidized retiree medical benefits, prescription drug benefits, and life insurance benefits provided to them at the time of retirement were vested and permanent, or that such benefits otherwise could not be materially reduced or terminated during their retirements. Upon information and belief, Defendant Embarq contends that these benefits were not vested or permanent, and that it lawfully terminated or reduced these benefits. Due to the recent actions by Defendant Embarq to terminate or reduce these benefits, this controversy warrants declaratory relief.

126. Plaintiffs and the members of the Class are entitled to declaratory relief in the form of an Order determining that Plaintiffs and the members of the Class and VEBA Sub-Class are entitled to reinstatement and restoration of the company-paid and subsidized retiree medical, prescription drug, and life insurance benefits from Defendants, and each of them, in the form in which they received them at the time of their retirements; reasonable attorneys' fees, expenses and costs pursuant to 29 U.S.C. § 1132(g); and such other and further relief as the Court may deem equitable and just.

FOURTH CLAIM FOR RELIEF

AGE DISCRIMINATION IN VIOLATION OF 29 U.S.C. § 623(a)

127. Plaintiffs and the Individual Age Discrimination Plaintiffs reallege paragraphs 1 through 103 as though fully set forth herein.

128. The actions of Defendants violate the prohibitions against intentional age discrimination in § 4(a)(1) of the ADEA, 29 U.S.C. § 623(a)(1), and violate the prohibitions against disparate-impact age discrimination in § 4(a)(2) of the ADEA, 29 U.S.C. § 623(a)(2).

129. Plaintiffs Fulghum, Dorman, Daniel, Joyner, Barnes, Games, Bullock, and Hollingsworth bring this Claim for Relief pursuant to the class, collective action provisions of the ADEA, 29 U.S.C. § 626(b), incorporating by reference the remedial provisions of the Fair Labor Standards Act ("FLSA"), 29 U.S.C. § 216(b). This Claim for Relief is brought against Defendants Embarq, Embarq Mid-Atlantic, and CT&T in their capacities as employers who are subject to the foregoing statutes.

130. The Individual Age Discrimination Plaintiffs bring this Claim for Relief

individually on their own behalf and by this pleading hereby state their desire and intention to opt in to any class and/or collective action allowed by the Court pursuant to the provisions of the ADEA and FLSA.

131. Plaintiffs Fulghum, Dorman, Daniel, Joyner, Barnes, Games, Bullock, Hollingsworth and each of the Individual Age Discrimination Plaintiffs filed timely Charges of Discrimination alleging age discrimination in the termination or reduction of their retiree medical, prescription drug, and life insurance benefits with the EEOC, on behalf of themselves and others similarly situated, including the members of the Class.

132. Plaintiffs have exhausted the administrative remedies necessary to proceed with individual claims and with a class, collective action under the ADEA. More than sixty days have elapsed since the Charges of Discrimination were filed.

133. Plaintiffs Fulghum, Dorman, Daniel, Joyner, and Hollingsworth bring this Claim for Relief as an opt-in, collective action pursuant to the ADEA, on behalf of the following "ADEA Class":

All persons, including all plan participants and all eligible spouse and dependent plan beneficiaries, whose rights to medical, prescription drug, and/or life insurance benefits or premium subsidies have been adversely affected by the terminations, reductions and changes in retiree benefits which were announced by Defendant Embarq Corporation on July 26, 2007.

134. Defendants' policies announced on July 26, 2007, and variously implemented on September 1, 2007, or January 1, 2008, constituted a pattern or practice of discrimination, making all retirees subject to these policies similarly situated.

135. The U.S. Equal Employment Opportunity Commission promulgated a final regulation on December 26, 2007, 29 C.F.R. § 1625.32, which was published at 72 Fed. Reg. 72938-72945. The regulation purports to exempt employers from the ADEA with respect to

employer revocations or limitations on health insurance benefits, including prescription drug benefits, for retirees who are age 65 or over. 29 C.F.R. § 1625.32(b). The regulation does not authorize revocation or limitation of life insurance benefits. 29 C.F.R. § 1625.32(c).

136. The EEOC's purported exemption of employers from the ADEA with respect to employer revocations or limitations on health insurance benefits, including prescription drug benefits, for retirees aged 65 or over was not authorized by the ADEA and is invalid.

137. The members of the ADEA Class are so numerous that the joinder of all class members prior to filing this lawsuit was impracticable.

138. The exact number of ADEA Class members is currently unknown to Plaintiffs. However, they believe that there are currently 3,000 retirees of the former Carolina Telephone and Telegraph Company and an estimated 14,000 retirees of Embarq Corporation nationwide.

139. Common questions of law or fact exist as to all members of the ADEA Class and these questions predominate over any questions solely effecting individual members of the class. Among the questions of law in common to the class are:

- a. Whether Defendants unlawfully discriminated against Plaintiffs and the members of the ADEA Class on the basis of their age by cutting off their right to company-sponsored and company-subsidized medical insurance.
- b. Whether Defendants unlawfully discriminated against Plaintiffs and the members of the ADEA Class on the basis of their age by eliminating payment of a monthly subsidy to assist in payment for Medicare prescription drug coverage.
- c. Whether Defendants unlawfully discriminated against Plaintiffs and the members of the ADEA Class on the basis of their age by reducing and

limiting their life insurance benefits to a \$10,000 death benefit and, in the case of VEBA participants, terminating the life insurance coverage, and therefore depriving them of the bulk of their life insurance benefits.

- d. Whether Plaintiffs and the members of the ADEA Class are entitled to the relief prayed for in this Complaint.

140. All of the Plaintiffs and Individual Age Discrimination Plaintiffs named in this Complaint have opted to assert and proceed with age discrimination claims to challenge the termination or reduction of their retiree medical, prescription drug, and life insurance benefits and subsidies.

141. All of the Individual Age Discrimination Plaintiffs assert their right to individualized relief with respect to the termination or reduction of their retiree medical, prescription drug subsidy, and life insurance benefits (including the Grand-fathered Life Insurance), in the event their ADEA claims cannot proceed as a collective action.

142. Plaintiffs request that the Court establish notification and filing procedures to create an opt-in class, as required by 29 U.S.C. § 216(b), in order to allow other similarly situated persons to join this action.

143. Defendants terminated Plaintiffs' rights to the life insurance coverage, medical insurance coverage, and prescription drug subsidies because of their age. Defendants thereby committed unlawful and discriminatory practices in violation of the provisions of the ADEA, as amended, 29 U.S.C. § 621, *et seq.*

144. Plaintiffs, the Individual Age Discrimination Plaintiffs, and the members of the ADEA Class are entitled to reinstatement of their benefits, and/or damages for the termination of their benefits, under the provisions of the ADEA.

145. Defendants' conduct, as described above, was willful, therefore entitling Plaintiffs and the members of the ADEA Class to liquidated damages in an amount equal to the damages specified above.

146. Plaintiffs, the Individual Age Discrimination Plaintiffs, and the members of the ADEA Class are further entitled to recover reasonable attorneys' fees and the costs and expenses of this action.

147. On this cause of action under the ADEA, Plaintiffs seek a jury trial.

FIFTH CLAIM FOR RELIEF

AGE DISCRIMINATION IN VIOLATION OF OHIO CIVIL RIGHTS ACT

148. Plaintiffs Kenneth Carpenter and Betty Carpenter reallege paragraphs 1 through 103 as though fully set forth herein, including the above-referenced class allegations.

149. This Claim for Relief is brought on behalf of all members of the Ohio Age Claim Sub-Class against Defendant Embarq.

150. Pursuant to Ohio Revised Code § 4112.01(A)(2), the term "employer" includes "any person acting directly or indirectly in the interest of an employer." Defendant Embarq is an "employer" under Ohio law.

151. All direct and indirect, disparate-treatment and disparate-impact forms of age discrimination are violations of Ohio Revised Code § 4112.02(A). The actions of Defendants violate the prohibitions against intentional and/or disparate-impact age discrimination in Ohio Revised Code § 4112.02(A). The Ohio Civil Rights Act is to be given a liberal construction, and states: "This chapter shall be construed liberally for the accomplishment of its purposes." Ohio Revised Code § 4112.08.

152. Plaintiffs Kenneth Carpenter and Betty Carpenter, for themselves and all members of the Ohio Age Claim Sub-Class, have elected a judicial remedy under Ohio Revised Code § 4112.02(N).

153. The remedies available under Ohio Revised Code § 4112.02(N) include “any legal or equitable relief that will effectuate the individual’s rights.” Plaintiffs Kenneth Carpenter, Betty Carpenter, and the members of the Ohio Age Claim Sub-Class seek an injunction requiring reinstatement of their medical, prescription drug, and life insurance benefits as they existed prior to January 1, 2008; restraining Defendant Embarq from future discrimination against them because of age; requiring reimbursement of the cost of any replacement insurance policies they have obtained, any benefits they were denied or expenses they incurred, and/or any differences in the benefits they obtained; prejudgment interest; an award of attorneys’ fees and the costs and disbursements of this action, and all other relief allowed by law.

154. On this cause of action under the Ohio Civil Rights Act, Plaintiffs seek a jury trial.

SIXTH CLAIM FOR RELIEF

**AGE DISCRIMINATION IN VIOLATION OF
OREGON UNLAWFUL DISCRIMINATION LAW**

155. Plaintiffs Somdahl and Dugger reallege paragraphs 1 through 103 as though fully set forth herein, including the above-referenced class allegations.

156. This Claim for Relief is brought by plaintiffs Somdahl and Dugger on behalf of all members of the Oregon Age Claim Sub-Class against Defendant Embarq.

157. Pursuant to O.R.S. § 659A.001(4), the term “employer” “means any person who in this state, directly or through an agent, engages or uses the personal service of one or more employees, reserving the right to control the means by which such service is or will be

performed.” Defendant Embarq is an “employer” under Oregon law.

158. All direct and indirect, disparate-treatment and disparate-impact forms of age discrimination are violations of O.R.S. § 659.030A(1)(b). The actions of Defendants violate the prohibitions against intentional and/or disparate-impact age discrimination in O.R.S. § 659.030A(1)(b).

159. Plaintiffs Somdahl and Dugger, for themselves and all members of the Oregon Age Claim Sub-Class, have elected a judicial remedy under O.R.S. § 659A.885.

160. The remedies available under O.R.S. § 659A.885(1) for violations of O.R.S. § 659A.030(1)(b) include “any legal or equitable relief that will effectuate the individual’s rights,” attorneys’ fees and costs. Plaintiffs Somdahl and Dugger and the members of the Oregon Age Claim Sub-Class seek an injunction requiring reinstatement of their medical, prescription drug, and life insurance benefits as they existed prior to January 1, 2008, restraining Defendant Embarq from future discrimination against them because of age, reimbursement of the cost of any replacement insurance policies they have obtained, reimbursement for any benefits they were denied or expenses they incurred, reimbursement for any differences in the benefits they obtained, prejudgment interest, an award of attorneys’ fees and the costs and disbursements of this action, and all other relief allowed by law.

161. On this cause of action under the Oregon Unlawful Discrimination Law, Plaintiffs seek a jury trial.

SEVENTH CLAIM FOR RELIEF

AGE DISCRIMINATION IN VIOLATION OF TENNESSEE CIVIL RIGHTS ACT

162. Plaintiff Sams realleges paragraphs 1 through 103 as though fully set forth herein, including the above-referenced class allegations.

163. This Claim for Relief is brought on behalf of all members of the Tennessee Age Claim Sub-Class against Defendant Embarq.

164. Pursuant to Tennessee Stat. § 4-21-102(4), the term “employer” includes “persons employing eight (8) or more persons within the state, or any person acting as an agent of an employer, directly or indirectly.” Defendant Embarq is an “employer” under Tennessee law.

165. All direct and indirect, disparate-treatment and disparate-impact forms of age discrimination are violations of Tennessee Stat. §§ 4-21-401(a)(1) and (2). The actions of Defendants violate the prohibitions against intentional age discrimination in Tennessee Stat. § 4-21-401(a)(1), and violate the prohibitions against disparate-impact age discrimination in Tennessee Stat. § 4-21-401(a)(2).

166. Plaintiff Sams, for himself and all members of the Tennessee Age Claim Sub-Class, has elected a judicial remedy under Tennessee Stat. § 4-21-311(d). The remedies available under Tennessee Stat. § 4-21-311(b) include back pay, injunctive relief, and attorneys’ fees and expenses. Plaintiff Sams and the members of the Tennessee Age Claim Sub-Class seek reimbursement of the cost of any replacement insurance policies they have obtained, reimbursement for any benefits they were denied or expenses they incurred, reimbursement for any differences in the benefits they obtained, prejudgment interest, an award of attorneys’ fees and the costs and disbursements of this action, and all other relief allowed by law.

167. On this cause of action Plaintiffs seek a jury trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs and the members of the Class and Sub-Classes pray that the Court grant the following relief:

1. Declare that the actions of Defendants as set forth herein are in violation of ERISA, and issue a preliminary and permanent injunction reinstating and restoring to Plaintiffs and the members of the Class the subject medical, prescription drug and life insurance benefits and compelling Defendants to provide these benefits to them for the remainder of their lifetimes;

2. Declare that the actions of Defendants as set forth herein are in violation of the ADEA, the Ohio Civil Rights Act, the Oregon Unlawful Discrimination law, and the Tennessee Human Rights Act, and issue a preliminary and permanent injunction reinstating and restoring to Plaintiffs, the Individual Age Discrimination Plaintiffs, and the members of the ADEA Class and the members of the Ohio, Oregon, and Tennessee Age Claim Sub-Classes the subject medical, prescription drug and life insurance benefits and compelling Defendants to provide these benefits to them for the remainder of their lifetimes;

3. Issue an injunction requiring reinstatement of the medical, prescription drug, and life insurance benefits for the members of the Ohio, Oregon, and Tennessee Age Claim Sub-Classes as they existed prior to January 1, 2008, restraining Defendant Embarq from future discrimination against them because of age, order reimbursement of the cost of any replacement insurance policies they obtained, order reimbursement for any benefits they were denied, order reimbursement for any differences in the benefits they obtained, and award of attorneys' fees and the costs and disbursements of this action;

4. Order equitable reformation of the subject Plans described in this lawsuit to reinstate these benefits and provide that these benefits shall not be reduced below the levels

provided to Plaintiffs and the members of the Class as of December 31, 2005;

5. Order an accounting of all profits and savings realized by the fiduciary Defendants and attributable to their misrepresentation of material information about the benefits, or attributable to their elimination of retiree medical, prescription drug, and life insurance benefits or their inducement of Plaintiffs and the members of the Class to retire early, including all such profits and savings relating to salary, compensation, pension benefits, fringe benefits, and all other payroll and overhead costs that were avoided as a result of inducing them to retire early;

6. Order a surcharge on the fiduciary Defendants, and grant restitution and other monetary relief, to make Plaintiffs and the members of the Class whole for all losses caused by the unlawful actions of the fiduciary Defendants, including payment of all medical benefits, prescription drug benefits and subsidies, and life insurance benefits, that have been improperly withheld from Plaintiffs and the members of the Class as of the time of judgment;

7. Declare that Plaintiffs and the members of the Class are vested in the retiree medical and prescription drug benefits provided by Defendants at the time of their retirements, or that these benefits cannot otherwise be reduced or terminated;

8. Declare that Plaintiffs and the members of the Class are vested in the life insurance benefits provided by Defendants at the time of their retirements, or that these benefits cannot otherwise be reduced or terminated;

9. Declare that Plaintiffs and the members of the Class are entitled to receive in the future retiree medical benefits, prescription drug benefits and subsidies, and life insurance benefits, unreduced from those promised to them at the time of their retirements;

10. Provide a jury trial on the ADEA claims and the claims under the Ohio Civil Rights Act, the Oregon Unlawful Discrimination Law, and the Tennessee Human Rights Act;

11. Award to Plaintiffs, the Individual Age Discrimination Plaintiffs, the members of the ADEA Class, and the members of the Ohio, Oregon, and Tennessee Age Claim Sub-Classes monetary damages for age discrimination, and double those damages for willful discrimination;
12. Award reasonable attorneys' fees and expenses/costs under 29 U.S.C. § 1132(g);
13. Award reasonable attorneys' fees, expenses and costs pursuant to 29 U.S.C. § 626(b) and 29 U.S.C. § 216(b) and pursuant to Ohio Revised Code § 4112.02(N), Oregon R.S. § 659A.885(1), and Tennessee Stat. § 4-21-311(b);
14. Award pre-judgment and post-judgment interest; and
15. Grant such other relief as the Court deems equitable and just.

Dated: September 10, 2008.

Respectfully submitted,

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**FULGHUM, ET AL. v.
EMBARQ CORP., ET AL.**

No. 07-CV-2602

SECOND AMENDED COMPLAINT -- APPENDIX A

Last Name	First Name	Birth Year	Date of Hire	Retirement Date	Age at Retirement
Abbott	Faye P.	1947	6/10/1966	3/1/2003	55
Adams	Judith R.	1944	6/27/1965	8/30/1997	52
Ainsley	Lois J.	1936	5/31/1955	5/4/1984	48
Aldridge	Robert D.	1945	2/2/1970	2004	59
Alford	James L.	1938	6/22/1964	10/1/1996	57
Allen	Johnny W.	1937	11/7/1956	2/1/2000	62
Allen	Mary S.	1928	1947	12/1/1985	56
Allgood, Jr.	Thomas G.	1926	1949	1985	59
Allgood	Evelyn A.	1934	Jan-54	Nov-99	65
Ammons	Henry W., Estate of	1933	1957?	1/1/1994	60
Anderson	Anzilia K.	1940	7/27/1970	11/1/1998	58
Anderson	Clara W.L.	1933	1970	2/1/1995	61
Anderson	Mary Ellen Anderson	1938	8/20/1967	3/1/1999	60
Armstrong	Donald E.	1945	7/26/1965	2/2/1998	52
Armstrong	Howard D.	1947	6/13/1966	10/1/2002	55
Armstrong	James E.	1937	8/9/1955	3/1/2001	63
Atkinson	Michael L.	1945	Mar-70	6/29/1997	51
Autry	Charles E.	1942	7/3/1967	7/1/1999	57
Autry	Dwight C.	1939	9/16/1966	3/1/1999	60
Autry	James L.	1931	Feb-54	8/29/1985	54
Autry	Lila H.	1938	Mar-57	3/1/2001	62
Avent	W. J.	1926	1946	Dec-89	63
Avery	Effie H.	1933	10/20/1952	8/31/1985	51
Ayers	Jamie B.	1937	2/11/1957	12/10/1993	56
Bailey	George W.	1946	2/3/1969	Mar-03	56
Baker	Johnny Preston	1939	10/1/1963	3/1/2000	60
Baker	Joseph K.	1937	5/19/1959	6/30/2001	64
Baker	Lough Massey	1945	2/12/1964	3/31/2000	54
Baker	Mary Harrell	1937	4/24/1967	2/15/1999	61
Baker	Ophelia H.	1924	Jun-45	Mar-90	65
Baker	Rufus James	1946	8/30/1965	4/17/2003	56
Baker	Shelby M.	1938	6/11/1956	5/1/1994	56
Baker	William A.	1945	6/10/1963	4/1/2001	56
Ball	Clifford E.	1943	10/17/1962	6/1/2006	63
Ball	Naomi M.	1930	1949	1992	62
Barden	Thomas V.	1921	3/10/1941	6/30/1982	61
Barnes	Katie Cook	1929	1948	Dec-91	62
Barnes	Sue H.	1941	9/8/1959	3/31/2003	61
Barnes	Thomas Scott	1940	6/7/1959	Nov-99	59
Barnes	Willie E.	1939	6/17/1957	9/30/1996	57
Basnight	Judith W.	1948	1/10/1971	12/1/2004	56
Bass	Gerald	1937	2/1/1961	Feb-01	63
Bass	Verona W.	1937	8/8/1955	1/1/1992	54
Batchelor	Carolyn J.	1947	Oct-68	7/1/2000	53
Batts	Frances L.	1932	1968	Aug-88	55
Batts	Gerald C.	1953	7/20/1971	Dec-01	48
Batts	Mary P.	1934	4/1/1953	6/1/1986	52
Beach	Madeline B.	1927	1952	12/2/1983	56
Beacham Jr.	Carl	1937	10/14/1959	6/1/2002	65
Beaman	Linda C.	1942	May-78	Sep-98	55
Beamon	Noah Alfred	1938	8/2/1979	3/3/2003	64
Bell	Jenette C.	1945	4/21/1973	5/20/2001	55

**FULGHUM, ET AL. v.
EMBARQ CORP., ET AL.**

No. 07-CV-2602

SECOND AMENDED COMPLAINT -- APPENDIX A

Last Name	First Name	Birth Year	Date of Hire	Retirement Date	Age at Retirement
Bender, III	V. Allen	1940	11/4/1968	11/4/1998	58
Benson	John O.	1944	12/1/1969	7/1/2000	56
Biggs	Peggy J.	1935	Jul-75	12/29/1992	57
Bill	Ronnie	1944	8/7/1967	Mar-02	58
Blades, III	L.S.	1933	1/1/1959	3/1/1996	63
Blalock	Essie L.	1937	1970	1999	62
Bland	Curtis W.	1946	2/9/1970	6/1/1998	51
Blount	Wynona H.	1931	Mar-60	Jun-90	58
Bobbitt	Mel Steven	1954	7/1/1974	Nov-02	47
Bordeaux	Johnny D.	1940	Jun-67	11/1/2002	61
Boyette	Ann L.	1947	1/11/1981	9/1/2004	57
Boyette	Geraldine E.	1935	1954	12/31/1992	57
Boyette	Jack H.	1928	1/21/1957	7/1/1991	63
Boykin	Mary B.	1942	1962	3/31/2003	60
Bracy	Joyce C.	1937	11/4/1957	12/31/1997	60
Bracy	Marian E.	1928	Jun-51	4/30/1980	51
Braddy	Janice C.	1936	5/31/1954	7/1/1994	57
Braddy	Thelma Robbins	1946	12/7/1964	12/31/2001	55
Braddy, Jr.	Claude	1934	8/24/1953	1/1/1993	58
Bradley	Steven P.	1947	6/11/1965	1990	43
Bradshaw	Jean T.	1931	1961	1986	55
Brady	Edward R.	1939	6/9/1958	4/1/2000	61
Brame	Mary Ann	1937	Sep-58	7/1/1996	58
Bratcher	Charles M.	1942	Sep-63	12/31/2001	59
Bratcher	Josephine S.	1944	1966	2000	56
Brewer	Linda G.	1944	4/12/1965	Sep-99	55
Britt	James Woodie	1918	2/28/1946	6/30/1985	66
Britton	Mary E.	1930	Jun-48	Apr-80	49
Brown	Audrey A.	1942	2/13/1964	3/29/2006	63
Brown	Carol J.	1945	?	9/1/1999	54
Brown	Eddie R.	1949	7/21/1973	4/1/2003	53
Brown	Graham T.	1946	2/15/1965	6/1/2003	57
Brown	Henry W.	1935	6/27/1988	1/9/1999	63
Brown	Janice	1937	5/22/1978	4/1/1992	55
Brown	William P.	1941	2/13/1967	?	
Brunson	Gordon D.	1932	11/21/1960	12/31/1993	61
Bucknam	Marie W.	1931	1/31/1974	8/1/1993	62
Bullock	Betsy G.	1943	8/23/1971	12/31/2001	58
Bullock	Geneva E.	1937	12/18/1967	12/18/1994	57
Bullock	Mattie J.	1936	7/6/1954	11/1/1999	63
Bunch	Patricia W.	1940	Sep-58	Mar-98	57
Bunch	Tony A.	1945	12/16/1968	7/1/2001	55
Burchette	Carol S.	1945	Jun-66	2/25/2002	57
Burgess	John Lee	1939	6/4/1959	8/1/1989	50
Burnette	James F.	1936	1/9/1956	6/1/2000	64
Burns	Ethel A.	1933	Jun-68	May-95	61
Burriss, Jr.	Clayton O.	1947	Apr-73	2002 Dec	55
Butler	Diamond H.	1941	3/5/1980	4/19/2004	63
Butler	Dorothy G.	1936	3/12/1956	4/30/1999	62
Butler	Franklin D.	1937	7/16/1956	12/31/1998	61
Byrd	Robert C.	1938	2/4/1968	6/1/1998	59
Cagle	Ruth M.	1926	Nov-59	1990	64

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Campbell	Bertha S.	1936	4/1/1956	Aug-97	61
Canady	Shirley G.	1944	11/10/1966	Jul-97	52
Carawan	Kerry W.	1938	1959	1997	59
Carlisle	Daniel H.	1941	5/10/1976	2/1/2006	64
Carnes	Stanton R.	1944	9/15/1964	12/1/1994	50
Carpenter	Estate of Milton R.	1932	Jun-50	Jun-96	63
Carr	Betty M.	1938	7/17/1957	Feb-97	58
Carraway	Dolores P.	1943	3/13/1967	12/1/2002	59
Carroll	Linda K.	1947	Feb-69	Aug-03	55
Carta	Lucille H.	1925	Mar-47	9/1/1985	59
Carter	Carl Ray	1929	10/18/1949	7/1/1991	62
Carter	Melvin S	1938	1/29/1963	7/1/2000	62
Carter, Jr.	Bernard John	1945	2/7/1966	Mar-01	55
Carver	Lois Ann	1933	11/1/1951	4/1/1994	61
Cashwell	Bobby B.	1931	9/4/1956	12/1/1993	62
Causway	Glenn M.	1944	1964	12/31/2001	57
Cherry	John W.	1945	12/9/1964	Dec-96	51
Chesson	Betty W.	1936	Apr-61	Jun-00	64
Chesson	Linda W.	1943	3/1/1965	11/30/1999	56
Childers	Eileen L.	1930	11/1/1949	7/1/1985	54
Chippis	Ann P.	1939	4/6/1970	11/1/2002	63
Clark	Daisy A.	1928	1946	10/25/1985	57
Clark	Donald E.	1937	3/4/1957	9/1/1994	57
Clark	Donald R.	1926	11/6/1950	8/31/1976	50
Clegg	Robert L.	1936	May-60	Nov-93	57
Cleland	Shirley W.	1937	Apr-64	Apr-99	61
Cobb, Jr.	Cullen	1930	7/17/1950	10/12/1990	60
Coble	Earl G.	1944	Jun-66	4/1/2007	62
Cofield	Josie D.	1943	1977	1996	53
Coggins	Annie M.	1933	7/1/1952	Nov-93	59
Coker	Colleen H.	1937	3/14/1960	3/31/2000	62
Coker	Naomi M.	1953	1/11/1971	2/16/2001	47
Coley	Alvin L.	1940	Dec-77	4/1/2006	65
Coley	Linda C.	1942	1/4/1979	Jun-01	58
Collins	Raymond A.	1936	10/24/1955	11/1/1997	61
Collins	Victoria C.	1940	3/11/1959	7/1/2002	62
Connor	Joyce L.	1941	1959	Aug-94	53
Cook	Nancy D.	1940	6/11/1960	1995	55
Cooley	Carl T.	1929	9/1/1953	1/1/1994	64
Cooley	William H.	1947	8/4/1969	10/17/1999	52
Cooper	Ann G.	1945	1/17/1966?	1/1/2002	56
Cooper	Callie L.	1918	1938	6/30/1980	62
Cooper	Charles W.	1948	1/23/1967	Nov-99	51
Corey	Edward G.	1947	Jun-69	3/1/2003	55
Council	James H.	1938	12/5/1960	11/1/1999	61
Cox	Dolly E.	1940	4/9/1960	7/1/1999	58
Cratch	Walter L.	1950	12/22/1969	app. 2000	50
Craver	John W.	1944	7/3/1967	3/1/2006	61
Creel	Henry E.	1940	10/1/1960	9/1/1993	52
Crocker, Jr.	Arvey O.	1945	2/14/1964	10/25/2002	57
Croom	Shelby A.	1948	5/5/1969	8/1/1997	49
Crumpler	Marshall W.	1935	12/1/1955	1/1/1994	58

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Crumpler	Melvin D.	1939	12/8/1960	3/1/1999	59
Curtis	Nancy R.	1939	12/1/1961	10/1/2005	66
Cutler	Harold B.	1936	10/31/1955	6/1/1998	61
Cutler	Jack E.	1930	Mar-55	Jun-91	60
Dail	Vernon R.	1938	10/8/1956	10/29/1993	55
Daniel	Ada F.	1941	2-1960?	Mar-02	60
Daniel	W. Dorsey	1940	?	6/1/1999	58
Daniels	Terry F.	1945	11/1/1968	12/31/1997	52
Daughtridge	Ulyss Glenn	1935	6/24/1957	3/1/1996	60
Davenport	Belva J.	1931	Mar-51	1985	54
Davenport	Shelby F.	1936	11/9/1960	3/1/1998	61
Davidson	Billy E.	1938	7/3/1965	app. 2001	63
Davis	Helen I.	1935	May-54	Apr-98	62
Davis	Hinton Carlton	1933	Mar-56	1/1/1996	62
Davis	Lesly B	1932	Jan-56	3/30/1995	62
Davis	Robert I.	1940	3/14/1966	11/1/1999	59
Davis	Selma W.	1930	11/19/1956	12/28/1992	62
Davis	Vivian W.	1940	2/2/1960	4/1/2003	63
Dawson	Jack D.	1927	2/8/1947	5/1/1985	58
Deal	Betty W.	1942	12/12/1980	12/31/1998	56
Deal	Walter F.	1942	6/12/1972	4/1/2003	60
Dempster	Janis S.	1940	11/14/1962	12/14/2000	60
Dennie	Betty Jean	1938	12/17/1956	Jul-92	53
Dennie	Bobby C.	1935	Nov-67	4/1/1992	56
Denny	Marcelene D.	1934	Sep-55	2/28/1989	54
Denton	Richard H.	1935	8/17/1957	12/31/1999	64
DeVane	Grace J.	1932	1950	Jul-94	61
Dickens	Edward M.	1937	Apr-61	Jun-99	62
Dildy	Margaret S.	1931	6/11/1953	9/1/1994	63
Dorman	Charles T.	1934	Jul-57	Jan-94	59
Dorman	Paul D.	1940	Jul-62	1/1/1994	53
Dorman	Willie J.	1938	May-59	3/1/1994	56
Doughtie	Gordon H.	1944	5/15/1967	12/31/1998	54
Doughtie	Lena W.	1944	2/8/1968	12/31/1998	54
Douglas	Martha M.	1945	11/29/1966	5/18/2006	60
Downing	Isabel	1929	Mar-55	Oct-85	56
Dozier	Eugene F.	1923	Feb-46	Feb-88	64
Duckett, Jr.	William F.	1945	10/4/1971	12/31/1997	52
Duke	George F.	1927	7/22/1946	10/1/1989	62
Duke	Julia J.	1942	May-60	3/30/2003	61
Dunn	Bobby E.	1933	Dec-56	Jul-96	62
Dunn	Lois W.	1935	5/31/1963	2/1/1998	62
Duvall	Robert W.	1939	9/26/1960	7/5/2000	61
Eastwood	Dolly O.	1932	7/27/1953	12/31/1987	55
Edgerton	Billy Y.	1937	3/16/1957	3/31/1996	58
Edmondson	Bobby Ray	1937	9/1/1955	1/1/1994	56
Edwards	Amy T.	1937	7/21/1971	11/1/1999	62
Edwards	Finley C.	1935	3/17/1957	1/1/1994	58
Edwards	W. Thomas	1947	3/28/1966	3/28/1996	48
Eldridge	Mary	1937	4/1/1956	11/1/1999	61
Elks	Mildred T.	1935	1955	10/1/1992	56
Ellington	Eva Kaye G.	1947	4/18/1966	11/1/1999	52

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Ellis	Christine K.	1935	Feb-54	Aug-90	55
Ellis	Larry T	1937	Aug-55	6/5/1988	50
Ellis	Louis E.	1937	12/19/1977	4/1/2000	62
Ellis	Lucille B	1942	Jun-60	Feb-97	54
Ellis	Michael L.	1948	9/21/1966	2002	54
Elmore	William E.	1944	12/18/1969	11/1/1999	54
Elmore-Stancill	Betty	1936	4/5/1955	Oct-93	57
Etheridge, Jr.	Selby A.	1924	11/7/1947	10/30/1984	60
Evans	Carolyn R.	1932	Jun-50	11/1/1993	61
Evans	Kermit M.	1926	Oct-55	8/30/1985	58
Evans	Tony W.	1950	10/2/1972	2/4/2003	52
Evans	Vonita H	1940	10/30/1960	3/1/1995	54
Ezzell	Jeannette M.	1936	5/23/1954	9/1/1998	62
Ezzell	Jenell B.	1939	Aug-59	7/1/1999	60
Ezzelle	John D	1931	Aug-54	Jan-94	62
Faircloth	Mavis E.	1927	3/8/1971	?	
Farrell	Olivia B.	1943	Feb-62	1/1/1997	53
Ferrell	Michael E.	1943	Aug-66	4/1/2003	59
Fields	Preston L.	1935	1/13/1960	3/1/1992	56
Fisher	Charles W.	1933	Apr-65	3/4/1994	60
Fisher	Leslie B.	1937	Jan-65	Nov-99	62
Fisher	Ruth F.	1932	1971	1989	57
Fleming	Janie G.	1934	8/4/1952	10/1/1989	55
Fling	Donna S.	1935	8/23/1960	3/1/1999	63
Flint	Dianne K.	1947	11/5/1979	2/1/2004	57
Floyd	Bertha S.	1937	12/1/1969	3/1/1999	61
Flythe	Linda L.	1945	2/8/1978	4/1/2002	56
Forbes	Clarence G.	1937	7/31/1968	3/1/1995	57
Forbes	Marilyn B	1955	8/5/1973	Apr-02	47
Foster	Martha S.	1949	10/9/1967	12/1/1997	48
Franks	Barbara	1937	Jun-55	7/1/1999	62
Frazier	William R.	1938	3/7/1960	Oct-02	64
Freeman	Judy S.	1946	? 10-5-72	4/1/2000	53
Fulghum	William Douglas	1938	6/18/1956	9/1/1996	58
Futrell	I. Gerald	1939	8/5/1963	5/1/1999	59
Games	William H.	1940	10/1/1959	12/31/2001	61
Gardner	Elizabeth H.	1934	1972	7/17/1996	62
Garrett	Linda A.	1947	Jul-65	Jun-00	53
Garrett	Robert L.	1947	11/9/1970	6/30/1999	52
Garris	Margie A.	1938	3/3/1959	4/1/1995	57
Gaskill	Deidrick H.	1924	12/29/1953	3/31/1990	66
Gaskins	Donald P.	1942	1/25/1972	7/1/1999	57
Gaskins	Linda H.	1947	2/8/1966	7/1/1999	51
Gay	Herbert L.	1931	3/24/1954	10/22/1993	62
Gay	Willie R.	1933	2/26/1956	1/1/1994	60
Gilbert	William A.	1926	11/4/1946	5/1/1989	63
Godwin	Willie E.	1936	7/5/1960	9/1/2003	67
Gore	Jerry S.	1944	6/10/1963	9/1/2000	55
Grady	Lillie B.	1939	May-57	Aug-99	60
Granger	Priscilla T.	1941	2/29/1960	12/31/2001	60
Grantham	Jane T.	1945	May-63	12/31/2001	56
Gray	Hilda B.	1924	Sep-42	1/1/1985	60

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Griffin	Grover L.	1933	Nov-57	12/31/1998	65
Grissom	Alton C.	1954	2/3/1973	12/4/2003	49
Guirkins	Rosalyn S.	1920	1942	1986	66
Gurganus	Charlie J.	1933	1/21/1957	3/1/1996	62
Gurkins	Van A.	1951	12/2/1971	1/1/2002	50
Hairr	Brenda B.	1948	7/18/1969	3/8/1999	50
Hairr	Junie Mack	1947	7/26/1965	3/1/1997	50
Hall	John O.	1938	9/12/1960	9/1/1996	57
Hamilton	Jimmy C.	1944	8/20/1964	5/1/2000	55
Hamm	Betty F.	1933	Jul-52	5/1/1988	54
Hancock	Joel F.	1943	8/26/1963	4/1/2003	60
Haney	James E.	1951	8/10/1970	1/1/2002	51
Hanford	Robert Alton	1933	10/1/1956	9/1/1995	61
Hardee	Frances H.	1940	Aug-60	9/1/1999	58
Hardee	Linda P.	1951	3/1/1970	10/1/2001	50
Harrell	Kenneth R.	1936	Jul-56	Nov-93	57
Harrell	Linda H.	1941	Jun-59	Jan-98	56
Harrell	Loretta F.	1932	1951	1994	62
Harrell	Melvin R.	1936	10-1963?	app. 1-1996	59
Harrington	John	1938	10/15/1956	5/1/2000	62
Harris	Alice W.	1950	1969	Feb-03	52
Harris	Donnie P.	1942	6/2/1969	3/31/2003	60
Harris	Doris C.	1937	1973	1993	56
Harris	Elizabeth R.	1935	10/14/1956	Oct-94	59
Harris, Sr.	Jimmy L.	1946	6/15/1965	11/22/1999	53
Harrison	Barbara J.	1946	2/1/1965	9/1/2003	57
Harrison	Norma H.	1928	10/18/1947	10/18/1984	56
Havens	Jonathan F.	1943	12/28/1967	1/1/1994	50
Heath	Shelby B.	1937	3/12/1956	6/1/1998	61
Hemby	David R.	1947	7/25/1971	4/1/2003	55
Henderson	Shirley G.	1938	1958	3/1/2007	68
Herman, Jr.	Bennie	1932	2/18/1957	11/30/1993	61
Herrin	Hoytte Douglas	1949	Jun-72	12/31/2001	52
Herring	Wilton L.	1935	May-55	Jun-87	52
Hewitt	Lindsey W.	1932	Feb-59	Aug-89	57
Hinson	Charles D.	1932	Apr-54	9/30/1993	60
Hinton	Ruby M.	1937	5/30/1972	4/25/1997	59
Hobgood	Bobby R.	1937	2/6/1961	3/1/2001	63
Holden	Lindbergh	1928	3/10/1956	9/1/1990	62
Holland	Christine M.	1920	8/17/1942	8/16/1985	64
Holland	Eugene R.	1927	Feb-45	10/31/1983	55
Holland	Julia H.	1931	2/18/1957	1/1/1994	62
Hollingsworth	John Douglas	1944	6/22/1964	12/31/2001	57
Hollis	Nancy L.	1935	4/19/1955	10/3/1985	50
Holloman	Jane F.	1937	2-2-7-1956	3/1/1987	49
Holloman	Murrell T.	1922	11/17/1944	12/1/1985	63
Holt	Roger L.	1934	6/22/1959	7/31/1990	55
Hooker	Rebecca F.	1946	Jun-65	Sep-97	51
Hopkins	Rosby R.	1925	9/1/1946	Dec-83	58
Hopkins	William H.	1930	1/11/1953	3/1/1995	65
Hopkins	Willie C.	1932	Jun-49	May-86	54
Horchler	Dennis	1946	Apr-73	11/1/2002	56

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Horne	Jeannette Faye	1941	Jun-61	Jun-96	54
Horton	Carolyn M.	1938	Aug-57	Dec-88	49
Hough	Clarence S.	1935	8/20/1956	8/1/1997	62
House	Annette A.	1940	1/19/1972	12/31/1998	58
Houston	Chester E.	1934	6/9/1952	9/1/1994	60
Houston	Stacy J.	1938	Jul-57	9/30/1996	57
Houtz	Heywood B.	1936	1958	11/30/1993	57
Howard	Maryland Y.	1935	5/19/1953	8/30/1985	50
Howell	Marvin	1930	Mar-50	Mar-85	55
Howse	Katherine H.	1925	1942	1983	58
Hudson	Dorothy E.	1940	4/13/1961	11/1/1994	54
Humienny, Sr.	S.J.	1926	Jan-47	10/31/1983	57
Ikner	James S.	1928	5/5/1955	12/1/1993	65
Ipock	Estella	1946	1965	Jun-00	54
Ipock	George L.	1946	Jul-65	11/24/2004	58
Irvin	Lewis R.	1923	7/10/1950	4/25/1985	61
Isles	Charles E.	1933	9/7/1955	12/31/1991	58
Jackson	Patricia D.	1951	Jun-69	3/1/2002	50
Jackson	Paul A.	1939	10/17/1960	6/1/1997	58
Jackson	Raymond L.	1940	3/15/1965	10/1/1995	55
Jackson	William Franklin	1944	8/10/1964	4/1/2000	55
James	Johnnie E.	1942	7/5/1960	9/1/1999	57
Jefferson	Joyce S.	1946	Jun-64	Mar-00	54
Jefferson	William W.	1941	6/10/1963	2/1/2003	62
Jenkins	Donald S.	1938	5/1/1967	3/1/1999	60
Johnson	James Kenneth	1935	6/17/1957	2/1/1998	62
Johnson	John Charles	1938	7/5/1960	9/1/1999	60
Johnson	Lillie M.	1940	Feb-65	Mar-03	62
Johnson	Marcus W.	1925	Apr-46	Feb-89	63
Johnson	Ralph A.	1936	9/8/1959	4/1/2006	70
Jolly	Bobby D.	1932	5/20/1954	2/1/1995	62
Jones	Alice R.	1935	6/21/1972	?	
Jones	Aubrey D.	1945	3/20/1966	11/1/1999	54
Jones	John C.	1949	5/19/1969	7/1/1999	50
Jones	Leona A.	1935	Jul-54	8/30/1985	50
Jones	Peter H.	1949	6/3/1968	7/1/1998	48
Jones	Shirley L.	1937	Apr-57	1/1/1991	53
Jones	Willie J.	1936	1957	1989	53
Josey	Norma C.	1941	Nov-59	3/31/2003	61
Joyner	Calvin Bruce	1938	6/25/1956	3/1/1994	56
Joyner	Dolly J.	1941	1/10/1961	11/1/1999	58
Joyner	Doris L.	1941	1/21/1969	5/1/1998	56
Joyner	Dorothy B.	1936	6/7/1954	9/1/1997	61
Joyner	Wilbur Glenn	1945	10/26/1964	5/8/2007	62
Justice	Nancy R	1927	Jan-70	May-89	62
Kearney	Charles J.	1933	Mar-57	3/1/1995	61
Keen	Martha H.	1934	1/20/1970	1/20/1997	62
Kelchner	W.E. (Bill)	1938	9/25/1960	10/31/1993	55
Kennedy	Donald G.	1944	Aug-68	May-00	56
Kennedy	Walter L.	1937	1/9/1961	1/1/1994	56
Killebrew	J. J.	1936	9/19/1955	1/1/1994	57
King	Eleanor S.	1925	5/5/1970	1986	61

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King	Irma E.	1930	6/1/1948	Nov-96	66
King	Thelma V.	1947	11/3/1971	7/1/1997	50
King	William (Mac) B.	1940	7/13/1959	9/1/1997	57
Kirkwood	Bruce R.	1936	9/17/1962	?	
Kirkwood	Lorraine E.	1942	6/12/1972	6/30/1999	56
Knott	Wesley G.	1950	2/23/1970	7/31/2001	51
Knowles	Charles Ray	1932	Jun-51	11/1/1993	71
Kricko	Miriam S.	1933	11/5/1979	8/1/1994	61
Lafferty	Thelma W.	1933	?	1997	64
Lamm	Bobby L.	1936	Dec-57	Feb-99	62
Lamm	Martha C.	1938	? 9/27/1978	app. 9/27/1997	58
Lamm	William E.	1934	?	?	
Lane	Dennis R.	1952	8/30/1971	8/30/2001	49
Langley	Ernestine C.	1948	7/24/1972	3/1/2005	56
Langley	James D.	1938	8/1/1956	12/31/2001	63
Lanier	Voilet H.	1940	12/7/1974	7/1/2000	60
Larrimore	William A.	1931	Jul-52	3/1/1989	57
Latham	Frances W.	1936	5/13/1955	7/1/1999	62
Lee	Kenneth	1934	6/30/1955	12/30/1994	60
Lee	Milton E.	1950	11/23/1972	11/30/1998	47
Lee	Patricia E.	1941	5/9/1960	9/1/1997	56
Lefevers	Roslyn A.	1934	1971	12/1/1994	60
Leggett	Billy M.	1935	11/11/1957	7/1/1999	63
Leggett	Sherrie B.	1951	1/12/1972	5/1/2002	51
Letchworth	Patricia C.	1940	Dec-59	Nov-01	61
Lewis	Betty D.	1940	5/6/1960	12/31/2001	61
Lewis	Brenda B.	1939	May-60	Feb-97	57
Lewis	Leo N.	1931	8/14/1931	Dec-93	61
Lewis	Sandra B.	1944	8/14/1967	9/1/2000	56
Lewis	Sybil Rowe	1936	1/3/1970	6/30/1996	59
Lewis	Sylvia B.	1936	9/10/1977	10/31/1996	60
Lilley	Polly C.	1938	3/26/1979	2/1/2004	65
Lilley	Shelby M.	1937	10/8/1956	6/2/1989	51
Lindsey	Norma Midyette	1952	6/24/1974	Oct-01	48
Little	Geraldine	1932	Mar-71	Apr-93	60
Littleton	B.G.	1934	10/15/1952	12/1/1993	59
Littleton	Thomas E.	1941	9/15/1959	10/1/1999	58
Lockamy	Gerald T.	1946	2/28/1968	5/1/1997	50
Long	Alice D.	1939	1958	Nov-90	51
Long	Betty B.	1942	11/8/1960	5/1/1992	50
Long	Clara M.	1940	3/10/1960	Apr-99	58
Long	Elsie O.	1932	?	?	
Lovick	Rachel G.	1938	Mar-88	May-98	59
Lucas	Faye M.	1942	Jul-60	1/1/1995	52
Lucas	Terry T.	1951	10/23/1973	1/1/2005	53
Mahan	Joyce C.	1933	1971	1996	63
Maier	George P.	1931	Jun-54	12/1/1993	62
Mallard	Donald H.	1940	Nov-62	Mar-97	56
Mallard	Randall G.	1935	6/10/1957	1/1/1993	57
Malpass	Shirley B.	1949	9/30/1968	2/1/2002	52
Manning	Mamie R.	1941	2/3/1960	2/16/2001	60
Mantas	Lucy O.	1941	Aug-59	Jul-99	58

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SECOND AMENDED COMPLAINT – APPENDIX A

Last Name	First Name	Birth Year	Date of Hire	Retirement Date	Age at Retirement
Marshburn	Joyce A.	1945	4/28/1968	3/1/1996	50
Martin	Joe E.	1931	11/22/1954	5/23/1993	61
Mason	Clarence L.	1945	Sep-69	4/1/2003	57
Massey	Helen C.	1929	1954	8/31/1990	61
Matthews	Rose D.	1938	4-8--57	3/14/1986	47
Matthews	Ruth H.	1924	1976	May-87	62
May	John T.	1934	Oct-56	12/1/1993	58
May	Kenneth S.	1938	9/10/1956	11/1/1993	55
Maynard	Mary H.	1921	9/1/1951	6/30/1983	62
Mayo	James P.	1923	Jul-48	Mar-83	60
McAdams	Mickey R.	1928	Jun-60	12/31/1997	69
McBride	Naomi B.	1934	3/26/1956	1/1/1998	63
McCarter	Roy E.	1931	?	12/27/1993	62
McCarter	William Troy	1936	Feb-76	1/1/1997	60
McCaskill	David L.	1938	2/11/1957	12/1/1993	55
McClure	Mae Vonne	1932	Aug-51	1/1/1994	61
McCorquodale	Alice R.	1941	5/10/1965	12/1/2003	62
McCullough	Clifford C.	1943	Feb-67	Aug-96	52
McCullough	Donna H.	1942	Sep-60	3/31/2003	61
McGlohon	Roderick A.	1936	5/8/1972	4/30/1998	61
McLamb	Daniel B.	1939	Jan-62	May-89	50
McLamb	Nellie O.	1947	8/2/1965	12/16/1994	47
McLaurin	Eunice Stephens	1934	?	8/13/1987	53
McLaurin	Laudie Colon	1933	Nov-53	12/31/1988	55
McLawhorn	Hilda A.	1941	Jan-61	12/1/1993	52
McLawhorn	Weldon E.	1933	9/11/1951	Mar-88	55
McLeod, Jr.	Neal C.	1932	10/10/1955	1/1/1994	61
McManus	Rachel C.	1939	Jul-57	8/28/1993	54
Medlin	Rodney M.	1948	9/12/1972	3/1/2000	51
Meeks	Linda L.	1942	Aug-68	Dec-03	61
Meeks	Margaret Ann	1930	9/2/1950	5/31/1981	50
Meeks	William Ann	1926	Jan-48	7/3/1986	59
Mercer	Ennis W.	1934	8/9/1955	Dec-93	59
Metts	Carlton V.	1945	7/31/1967	8/1/2000	55
Miller	James Truitt	1942	Feb-65	Mar-95	52
Miller	Jeanette Y	1933	1951	1996	63
Miller	Leon Gene	1932	6/13/1955	6/30/1985	52
Miller	Mary M	1936	8/2/1954	7/1/1999	62
Mills	Darling David	1939	9/9/1957	Mar-99	60
Minton	Virginia R .	1934	8/31/1953	8/31/1983	48
Mitchell	Ethel D.	1930	Feb-51	7/1/1984	53
Moore	Dorothy R.	1941	3/12/1962	4/1/2002	60
Moore	George Jr.	1930	5/23/1953	7/1/1989	59
Moore	James H.	1937	Aug-65	app. 2000	63
Moore	Jane T.	1929	4/26/1948	1980	51
Moore	Jesse C.	1935	10/11/1956	11/12/1993	58
Moore	John Thomas	1941	4/18/1963	11/1/1999	58
Moore	Lemuel K.	1938		2000	62
Moore	Marland G.	1936	10/11/1955	10/11/1985	49
Mooring	Barbara F.	1944	Oct-63	12/31/2002	58
Morris	William C.	1928	Nov-55	3/31/1986	57
Morrow	Evelyn F.	1946	Mar-65	5/1/1998	52