

STATE OF NEW JERSEY
DEPARTMENT OF LAW & PUBLIC SAFETY
DIVISION ON CIVIL RIGHTS
DOCKET NUMBER: EH15WB-60889

Charles E. Morgan IV,)
)
 Complainant,)
)
 -vs-)
)
 Sony DADC,)
)
 Respondent.)

NEGOTIATED SETTLEMENT
AGREEMENT

WHEREAS, the named Complainant has filed a Verified Complaint with the Division on Civil Rights alleging that Sony Music Holdings Inc. d/b/a Sony DADC Americas ("Sony DADC"), committed unlawful discrimination; and

WHEREAS, the named Respondent, Sony DADC, is an employer doing business in the State of New Jersey, having a facility located at 400 N. Woodbury Road in Pitman, New Jersey 08071; and

WHEREAS, the Respondent does not admit that an act of unlawful discrimination occurred; and

WHEREAS, the Director of the Division on Civil Rights has not made any findings based upon the merits of this matter; and

WHEREAS, the Respondent desire to resolve the matter without the necessity of further litigation; and

WHEREAS, the Director of the Division on Civil Rights shall execute this Negotiated Settlement Agreement to certify that the covenants contained herein are appropriate to resolve and to insure that all covenants are implemented.

NOW THEREFORE, it is on this

17th day of *Sept.*

2010, agreed between the parties heretofore mentioned that:


1. The Respondents shall continue to comply with the provisions of N.J.S.A. 10:5-1 et seq.
2. Respondent, Sony DADC, agrees to pay Complainant the lump sum of Twenty Thousand Dollars (\$20,000.00) as full settlement of all claims for damages rising out of this matter.
3. Respondent, Sony DADC, agrees to submit to the Division on Civil Rights a check in the lump sum amount of Twenty Thousand Dollars (\$20,000.00) payable to **Charles E. Morgan IV**, upon signing the herein Agreement, and the Division will in turn, deliver it to the Complainant.
4. Respondent, Sony DADC, agrees that if contacted by Complainant's prospective employers, it will provide a neutral reference acknowledging Complainant's dates of employment, position title and duties, and not provide any negative information that would hinder his efforts to obtain future employment.
5. Respondent and Complainant agree not to engage in any retaliatory conduct against one another or any participant in these proceedings nor will the Respondent allow any of its employees to engage in any such conduct.

This Negotiated Settlement Agreement shall operate as a complete and final disposition of the aforesaid Verified Complaint and any Equal Employment Opportunity Commission charge which may be pending subject only to the fulfillment of all the foregoing provisions.



Charles E. Morgan IV,
Complainant

DATED: 9/17/10



John Towers,
Senior Vice President and
Chief Financial Officer for Respondent

DATED: 8/19/10

FOR THE DIVISION: 
