

6. By an Opinion and Order dated May 12, 1989, Judge Pettine set as an interim goal for 1991 63 tenured women faculty and also concluded that the University would be in "substantial compliance" with the ultimate goal of "full utilization" or "full representativeness" if Brown had on its faculty 67 tenured women in 1991. Manuscript opinion, p. 14. As of July, 1991, the University has met this goal of 67 tenured women faculty.

7. The Petitioners recognize and acknowledge that the University, under the Lamphere Consent Decree and in cooperation with the Class Representatives, the faculty and the individuals who have been and are participants in the system and procedures set forth in the Decree, have been successful in increasing the number of tenured and nontenured women on the University faculty.

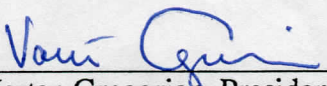
8. The Petitioner, Brown University, asserts that all affirmative action procedures set forth in the Decree have been complied with and that it has substantially complied with the goals and time tables established pursuant to Decree and has achieved substantial compliance of full representativeness of women on its faculty.

9. The Petitioners, Class Representatives, submit that there has been substantial compliance with the broad purpose of the Consent Decree and that in the fourteen years of the Decree's existence Brown has become a leader, among the universities to which it is most commonly compared, in the recruitment and hiring of tenured and untenured women faculty.

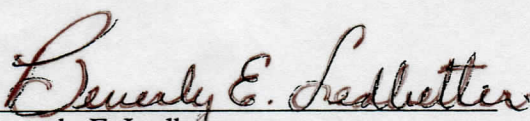
In accordance with an overwhelming vote by mail ballot, class members authorized the Class Representatives to support the vacating of the decree should the faculty adopt procedures for the hiring and promotion of faculty as jointly submitted by the University and the Class Representatives. This petition follows the adoption of these procedures by the Faculty and the subsequent approval of the same by the Corporation.

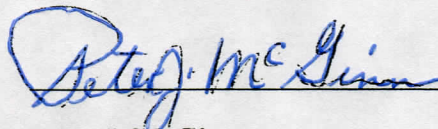
In a spirit of cooperation the Class Representatives and the University believe and hereby submit to the Court that there is no longer a need for continuance of the Consent Decree in the above-entitled action and that the Consent Decree should be terminated forthwith.

BROWN UNIVERSITY

By: 
Vartan Gregorian, President

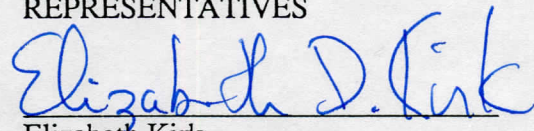
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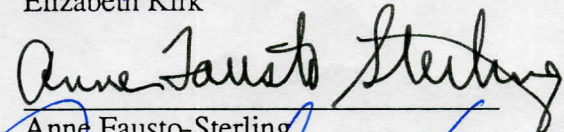

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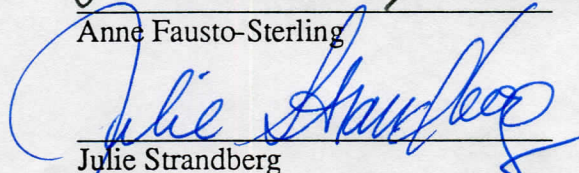

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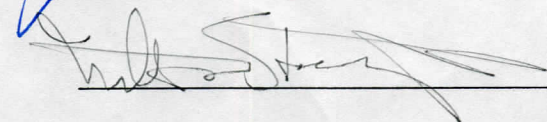
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Dated: _____, 1992.