

ILLUSTRATION OF PRINCIPLE THAT IF WOMEN ARE ON AVERAGE LESS SKILLED OR EXPERIENCED AMONG THE APPLICANTS THE CHARACTERISTICS OF THE FEMALE HIRES WILL APPEAR TO BE LOWER THAN THE CHARACTERISTICS OF MALE HIRES EVEN WHERE THERE ARE DISPARITIES ADVERSE TO WOMEN IN EACH SKILL GROUP

I. ACTUAL HIRES AND APPLICANTS AS CODED BY SEARS

<u>Number of Relevant Experiences</u>	<u>Female Proportion of Applicants</u>	<u>Female Proportion of Hires</u>
None	68.5	52.6
One	58.7	32.5
Two	41.6	21.6
Three or More	22.4	13.9

II. FEMALE HIRES EXPERIENCE CALCULATION

<u>Number of Relevant Experience</u>	<u>Number of Hires</u>	<u>Points</u>		
None	425	0		
One	136	136		
Two	51	102		
Three	38	114		
	<u>650</u>	<u>352</u>		
			Average:	0.54
			Top 40%:	0.57
			Bottom 40%:	0.00

III. MALE HIRES EXPERIENCE CALCULATION

<u>Number of Relevant Experience</u>	<u>Number of Hires</u>	<u>Points</u>		
None	383	0		
One	283	283		
Two	185	370		
Three	235	705		
	<u>1086</u>	<u>1358</u>		
			Average:	1.25
			Top 40%:	2.51
			Bottom 40%:	0.35

Corrected

Plaintiff's Exhibit  
Wise 1 (I-D.)

ILLUSTRATION OF THE CHARACTERISTICS OF THE HIRES WHERE WOMEN  
ON AVERAGE HAVE LOWER QUALIFICATIONS AMONG THE APPLICANTS,  
ASSUMING EQUAL HIRING

Skill Rating	Total Appl.	Female		Total Hires	Female Hires	Female Points	Male Hires	Male Points
		Percentage Appl.	Hires					
100		.15	.15	100	15.0	1500.0	85.0	8500
95		.20	.20	200	40.0	3800.0	160.0	15200
90		.25	.25	300	75.0	6750.0	225.0	20250
85		.30	.30	400	120.0	10200.0	280.0	23800
80		.35	.35	500	175.0	14000.0	325.0	26000
75		.40	.40	500	200.0	15000.0	300.0	22500
70		.45	.45	400	180.0	12600.0	220.0	15400
65		.50	.50	300	150.0	9750.0	150.0	9750
60		.55	.55	200	110.0	6600.0	90.0	5400
55		.60	.60	100	60.0	3300.0	40.0	2200
				3000.0	1125.0	83500.0	1875.0	149000
		<u>Overall Averages</u>				<u>74.2</u>		<u>79</u>
		<u>Top 10%</u>						
100					15.0	1500.0	85.0	8500
95					40.0	3800.0	102.5	9737
90					47.5	4275.0	187.5	18237
					<u>112.5</u>	<u>9575.0</u>		<u>97</u>
						<u>85.1</u>		
		<u>Bottom 10%</u>						
55					60.0	3300.0	40.0	2200
60					52.5	3150.0	90.0	5400
65					112.5	6450.0	57.5	3737
						<u>57.3</u>	187.5	11337
								<u>60</u>

ILLUSTRATION OF THE EFFECTS OF DISCRIMINATION ON THE RELATIVE PERFORMANCE OF MALE AND FEMALE HIRES ASSUMING THAT DISCRIMINATION DISPROPORTIONATELY AFFECTS WOMEN IN THE LEAST SKILLED GROUPS (Disparity range: male success rate 1.29 times female success rate in most skilled group; 3.5 times female success rate in least skilled group)

Skill Rating	Total Hires	Female Percentage		Female Hires	Female Points	Male Hires	Male Points
		Appl.	Hires				
100	100	.15	.12	12.0	1200.0	88.0	8800.0
95	200	.20	.14	28.0	2660.0	172.0	16340.0
90	300	.25	.16	48.0	4320.0	252.0	22680.0
85	400	.30	.18	72.0	6120.0	328.0	27880.0
80	500	.35	.20	100.0	8000.0	400.0	32000.0
75	500	.40	.22	110.0	8250.0	390.0	29250.0
70	400	.45	.24	96.0	6720.0	304.0	21280.0
65	300	.50	.26	78.0	5070.0	222.0	14430.0
60	200	.55	.28	56.0	3360.0	144.0	8640.0
55	100	.60	.30	30.0	1650.0	70.0	3850.0
	3000			630.0	47350.0	2370.0	185150.0

(.210)

Overall Averages

75.2

78.1

Top 10%

100	12.0	1200.0	88.0	8800.0
95	28.0	2660.0	149.0	14155.0
90	23.0	2070.0	237.0	22955.0
	<u>63.0</u>	<u>5930.0</u>		<u>96.9</u>
		<u>94.1</u>		

Bottom 10%

55	30.0	1650.0	70.0	3850.0
60	33.0	1980.0	144.0	8640.0
65	63.0	3630.0	23.0	1495.0
		<u>57.6</u>	<u>237.0</u>	<u>13985.0</u>
				<u>59.0</u>

Plaintiff's Exhibit  
Wise 3 (I.D.)