

EXHIBIT A

CHRONOLOGY¹

- August 21, 2015 Recorder's Office files Motion to Amend Cook County Recorder of Deeds' Exempt List to add Chief of HR position.
- September 1, 2015 Motion hearing held and the Recorder's Office's motion entered and continued. Court advises parties that the Chief of HR position should not be delayed based on concerns regarding the Director of HR position. Court urged parties to work together on the reorganization of HR. Additionally, Court denies Plaintiffs' request for discovery.
- After the hearing in court, Plaintiffs' counsel suggests to the Recorder's Office that it find an Exempt position in which to place the current Director of HR. Counsel for the Recorder informs him that there are no open Exempt positions but that it had an Exempt position on hold which would suit the Director of HR. Plaintiffs' counsel advises that their analysis is based only on the job description for Exempt purposes and the Recorder can select whomever she wants provided the person meets the minimum qualifications. Plaintiffs' counsel notes that the RCA made the same suggestion previously.
- September 14, 2015 Counsel for Recorder's Office contacts Plaintiffs' counsel and RCA to schedule meeting to discuss pending motion to amend the Exempt List; parties agree to meet at offices of Plaintiffs' counsel.
- September 15, 2015 Recorder's Office provides Plaintiffs' counsel and RCA with draft job description for the position of Special Assistant to the Recorder-Community Affairs that is designated as Exempt.
- September 16, 2015 Parties meet at offices of Plaintiff's counsel to discuss restructuring of HR, including the Exempt position of Special Assistant to the Recorder-Community Affairs.
- September 18, 2015 Recorder's Office provides information to Plaintiff's counsel and RCA concerning positions about which Plaintiff's counsel and/or RCA inquired; Recorder's Office also provides Plaintiffs' counsel and RCA with a revised job description for the Special Assistant to the Recorder-Community Affairs position based on their edits. The position remains designated as Exempt.

¹ This Chronology is created from email exchanges and discussions had between the Recorder's Office, Plaintiffs' Counsel, and the RCA. The emails will be made available to the Court for in camera review should the Court deem necessary or helpful.

- September 29, 2015 Based on additional discussions, the Recorder's Office provides Plaintiffs' counsel and RCA a revised job description for the Special Assistant to the Recorder-Community Affairs position that still designates the position as Exempt.
- October 16, 2015 Counsel for Recorder's Office contacts Plaintiffs' counsel requesting their position on the Exempt Chief of HR, Director of HR, and the Exempt Special Assistant to the Recorder-Community Affairs positions.
- October 22, 2015 Plaintiffs' counsel provides counsel for Recorder's Office and RCA with suggested changes to job description for Special Assistant to the Recorder-Community Affairs position that is still designated as Exempt; Plaintiffs' counsel also inquires as to Recorder's position as to eliminating Director of HR position.
- November 4, 2015 Counsel for Recorder's Office advises Plaintiffs' counsel and RCA that the Recorder accepts Plaintiffs' suggested changes to the Special Assistant to the Recorder-Community Affairs job description and has incorporated changes into the job description that still designates the position as Exempt, and provides the final version to the parties; Counsel for Recorder's Office also provides parties with resume for the current Director of HR whom the Recorder seeks to place in the Exempt Special Assistant to the Recorder-Community Affairs position; Counsel for Recorder's Office advises Plaintiffs' counsel and RCA that Recorder would agree to eliminate Director of HR position if the current Director of HR is placed in the Exempt Special Assistant position.
- Plaintiffs' counsel seeks clarification as to current Director of HR's work experience as reflected in his resume to determine if he meets the minimum qualifications of the final version of the Exempt Special Assistant job description.
- November 5, 2015 Recorder's Office provides Plaintiffs' counsel and RCA with information concerning the experience of the current Director of HR.
- Plaintiffs' counsel seeks additional clarification as to current Director of HR's experience.
- November 6, 2015 Recorder's Office provides Plaintiffs' counsel and RCA with requested information concerning current Director of HR's experience.

November 10, 2015 Recorder's Office advises Plaintiffs' counsel that an agreed order to amend the Exempt List will be prepared if parties agree that current Director of HR meets minimum qualifications for the Exempt Special Assistant to the Recorder-Community Affairs position. No response is received.

November 23, 2015 Counsel for Recorder's Office provides Plaintiffs' counsel and RCA with a draft Agreed Motion to Amend the Exempt List, updated Exempt List, and proposed Agreed Order for review. No response is received.

November 30, 2015 Recorder's Office provides DOC with the proposed Agreed Motion to Amend the Exempt List, updated Exempt List, and Proposed Agreed Order for review.

December 1, 2015 DOC advises the Recorder, RCA and Plaintiffs' counsel that he has reviewed the proposed changes to the Exempt List and approves those changes.

Counsel for Recorder's Office provides notice to the RCA and Plaintiffs' counsel of the DOC approval of the proposed changes to the Exempt List and requests notice of any objections from RCA or Plaintiffs' counsel.

December 7, 2015 Counsel for the Recorder's Office again requests notice of any objections from the RCA or Plaintiffs' counsel.

December 15, 2015 Deadline for Plaintiffs' counsel to provide notice of any objections to the proposed changes to the Exempt List; no response or objections received from Plaintiffs' counsel or RCA

December 16, 2015 Counsel for Recorder's Office files the Motion to Amend Exempt List

Plaintiffs' counsel advises the Court, counsel for the Recorder's Office, and RCA that they object to designating the Special Assistant to the Recorder-Community Affairs position Exempt despite not once raising the issue to the Recorder's Office, removing the Exempt designation from the job description, and engaging in extensive discussions as to whether or not the current Director of HR met the minimum qualifications.

Counsel for Recorder's Office advised Court, Plaintiffs' counsel, and RCA that Plaintiffs' objections were untimely pursuant to the Employment Plan and should not be considered by the Court.

Plaintiffs' counsel advises counsel for Recorder's Office and RCA that there is no objection to adding Chief of HR to the Exempt List but that they object to adding Special Assistant-Community Affairs position as Exempt.

January 5, 2016

Plaintiffs' counsel filed Plaintiffs' Response to Cook County Recorder of Deeds' Motion to Amend Exempt List.

January 6, 2016

Court directs RCA to file a statement regarding the proposed changes to the Exempt List.

January 28, 2016

RCA filed a Statement by the Shakman Compliance Administrator for the Cook County Recorder of Deeds Concerning the Recorder's Motion to Amend the Exempt List.