

2-24-1987

## Letter to Magistrate Dolinger re: Mrs. Gloria Quiroga

Lewis M. Steel '63

**STEEL BELLMAN & LEVINE, P.C.**

Attorneys at Law

351 Broadway, New York, New York 10013

(212) 825-7400

Richard F. Bellman  
Lewis M. Steel  
Alan H. Levine  
\_\_\_\_\_  
Susan Ritz

BY HAND

February 24, 1987

Hon. Michael Dolinger  
United States Magistrate  
United States Courthouse  
Foley Square  
New York, New York 10007

Re: Avagliano, et al. v. Sumitomo Shoji America  
77 Civ. 5641 (CHT)  
Incherchera v. Sumitomo Corp. of America, Inc.  
82 Civ. 4930 (CHT)

Dear Magistrate Dolinger:

At your request, I am enclosing a copy of the correspondence which I received from Gloria Quiroga. This correspondence includes the following:

Ms. Quiroga's letter to this law firm dated February 19, 1987 and the following attachments:

- a. A memorandum dated January 5, 1987 to Ms. Quiroga from Mr. Yamahiro of the Dallas SCOA office.
- b. A two page letter dated January 16, 1987 from Ms. Quiroga to Mr. Taura.
- c. A two page letter dated January 29, 1987 to Ms. Quiroga from Mr. Stripay.
- d. A two page outgoing telex dated 6/30/86 which has attached thereto two phone directories for the Dallas SCOA office with various changes written in.
- e. A notice to Ms. Quiroga dated June 20, 1986.
- f. A copy of the Dallas SCOA office internal phone list dated 1985.

g. A memorandum to Houston and Dallas SCOA employees dated December 29, 1983.

h. A letter dated October 8, 1982 from Mr. Miki, manager of the Dallas steel department, and an attachment thereto dated January 10, 1985 to Ms. Quiroga, as well as a one page attachment on what appears to be a Saks Fifth Avenue letterhead.

I also enclose a copy of the letter which I mailed today to Ms. Quiroga in accordance with our discussion in court at the end of the fairness hearing. This letter has been sent both by overnight delivery and regular mail and both letters contain full copies of the decree.

A copy of this letter and a copy of my letter to Ms. Quiroga is also being sent to Ronald Green, Esq.

Very truly yours,

STEEL BELLMAN & LEVINE, P.C.

by

  
LEWIS M. STEEL

LMS:PC

Enclosures

cc: Ronald Green, Esq.

**STEEL BELLMAN & LEVINE, P.C.**

Attorneys at Law

351 Broadway, New York, New York 10013

(212) 925-7400

Richard F. Bellman

Lewis M. Steel

Alan H. Levine

Susan Ritz

FEDERAL EXPRESS

February 24, 1987

Ms. Gloria Quiroga  
2001 Chisholm Trail  
Grand Prairie, Texas 75052

Re: Avagliano, et al. v. Sumitomo Shoji America  
Incherchera v. Sumitomo Corp. of America

Dear Ms. Quiroga:

I am in receipt of your letter dated February 19, 1987. At this time, it is my function to deal with problems related to the enforcement of the decree rather than individual cases which class members may have regarding what occurred to them before the decree was signed by the parties.

If you have any question as to whether your discharge violated state or federal law, you should consult with counsel of your own choice. I enclose a copy of the proposed settlement agreement so as to aid your representative or yourself in analyzing the situation.

I did raise your situation with Magistrate Michael Dolinger at the hearing with regard to the fairness of the settlement which, as you know, took place today. At the conclusion of the hearing, it was agreed that either your representative or yourself may have ten days from the date of your receipt of this letter to write Magistrate Dolinger and set forth whatever you feel may be appropriate. If you do not respond within that time period, the Magistrate will not consider what you say. Magistrate Dolinger's address is:

Hon. Michael Dolinger  
United States Magistrate  
United States District Court  
Southern District of New York  
Foley Square  
New York, New York 10007

If you do communicate with the Magistrate, please also refer to the names of these cases as follows:

Avagliano, et al. v. Sumitomo Shoji  
America - 77 Civ. 5641 (CHT)

Incherchera v. Sumitomo Corp. of  
America - 82 Civ. 4930 (CHT)

At the request of Magistrate Dolinger, I am making a copy of the correspondence you sent to me available to him and to counsel for SCOA.

Very truly yours,

  
Lewis M. Steel

LMS:PC

Enclosure

cc: Hon. Michael Dolinger  
Ronald Green, Esq.

February 19, 1987

RECEIVED FEB 20 1987

Steel Bellman & Levine, P.C.  
351 Broadway  
New York, New York 10013

Attention: Mr. Lewis M. Steel

Dear Mr. Steel:

My name is Gloria Quiroga, I am a former employee of Sumitomo Corporation of America, Dallas office, recently terminated.

I was employed by SCOA for 14 years. I had seniority as the other two secretaries have been with SCOA 4 years and 2 years.

The Dallas office closed its steel department on December 16, 1986. My boss Mr. S. Yamahiro, a male Japanese employee was transferred to the Houston office, but I was terminated on January 5, 1987. I feel they have not treated me fairly. I had the title of administrator and aside from the steel department duties, I also handled General Affairs and Personnel.

However in June of 1986 Mr. Yamahiro took my name off the General Affairs & Personnel Departments, said that I would continue to perform those duties but only his name would remain under those departments ( I have his request to this in his own handwriting ) I feel that they took my name off those two departments so that I was only under the steel department, and when they closed the steel department, they were able to terminate me. However, if they terminated me, why did they not terminate Mr. Yamahiro also or offer me a position elsewhere? I requested a position of Receptionist/Secretary open in the Dallas office but got no answer.

On January 16, 1987 I wrote a letter to Mr. Sado Taura, President of SCOA, asking for his help. On January 26, 1987 I received an answer from his assistant, Mr. Thomas J. Stripay, saying they were very sorry about my situation and even though seniority was important they did not wish to disrupt the other departments. They made no mention to the Receptionist/Secretary position I had requested.

Enclosed you will find copies of letters, and other papers to back everything I have just told you. Please let me know if you think I was treated unfairly and if you think I have any ground to stand on. Your Kind consideration to this matter will be greatly appreciated.

Sincerely,



Gloria Quiroga  
2001 Chisholm Trail  
Grand Prairie, Texas 75052  
(214) 641-8429



# SUMITOMO CORPORATION OF AMERICA

DALLAS OFFICE  
717 N. HARWOOD STREET, SUITE #1700 (LB 59)  
DALLAS, TEXAS 75201

(214) 742-8104  
TELEX 73-2239  
PANAFAX (214) 742-5881

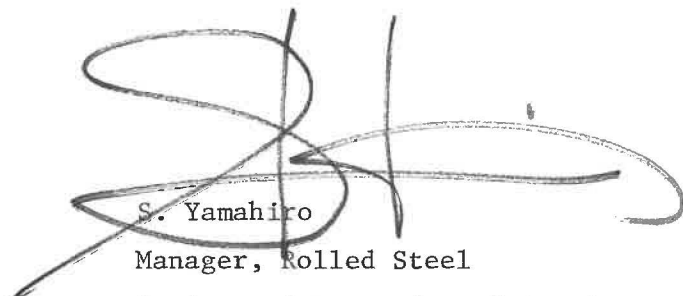
January 5, 1987

To: Ms. Gloria Quiroga

Re: Official Notice for Termination

This is our formal notice to you that your last working day for Sumitomo Corporation of America is today, January 5, 1987.

Confirmed by:



S. Yamahiro  
Manager, Rolled Steel  
Sumitomo Corporation of America  
Dallas Office

January 16, 1987

Mr. Sadao Taura  
President and  
Chief Executive Officer  
SUMITOMO CORPORATION OF AMERICA  
345 Park Avenue  
New York, New York 10154

Dear Mr. Taura:

On the heels of the settlement of the law suit in New York, comes my problem. My delay in writing to you has been due to my "total shock" at having been terminated by Sumitomo Corporation Of America.

As you know, the Steel Department in the Dallas office was closed on December 16, 1986. Mr. S. Yamahiro was transferred to the Houston office and I was terminated on January 5, 1987 after fourteen years of faithful service to SCOA.

Until October, the Dallas office employed four ladies, three secretaries and a secretary/receptionist. The secretary/receptionist left in October and has not been replaced. I asked Mr. Yamahiro to transfer me to her position where I would be able to continue to help with the over-flow of work in the DALKZ department which is always very busy. I would also be able to continue my office administrative duties.

I came to work for SCOA in 1964 when we were located in the Cotton Exchange building. I was hired by Mr. H. Yonei and Mr. Ray Reedy. I began as a secretary/receptionist. Over the years I worked for Mr. Jun Shiratori, Mr. Akikasu Satake, Mr. H. Fukatani, Mr. Goro Hibino, Mr. Haruhiko Miki, Mr. Kanatake Kuyama, Mr. Eiki Suzuki and Mr. Shinichiro Yamahiro.

In 1968 I left SCOA to stay home with my three young daughters. In 1977 Mr. Ray Reedy asked me if I would consider returning to Sumitomo and I happily resumed my career with SCOA at that time.

During those years, I trained the new secretaries and receptionists. I was not only secretary of the steel department while Mr. Suzuki was Manager of the Dallas office but was promoted to Administrator by Mr. T. Imagawa, Senior Vice President and General Manager of the Houston Office. Mr. Suzuki gave me the responsibility of handling the general affairs in the office such as company house, company car, insurance, office contents, all renewals, telephone problems, telex problems, office placement representatives and I loved it!

In the personnel department, I did the interviewing and testing of all new applicants after placing the ads and contacting agencies. Our managers saw an applicant after I did the screening.

My point is that I was not just a secretary in the steel department. Since I have worked in all departments of the Dallas office, my termination does not seem to have a valid reason.



Mr. Sadao Taura  
New York, New York

The two secretaries still employed in the Dallas office have been with SCOA four years and two years. Sumitomo Has alway been big on seniority. I have always been an efficient and loyal employee and assured that my position with SCOA was secure as long as the Dallas office was in operation.

Mr. Taura, I have worked for SCOA since 1964. I am 52 years old and I have no desire to start over again.

I am bringing my plight to you because you have the ultimate authority to see that fairness to loyal employees prevails. Your kind consideration and help in this matter will be greatly appreciated.

Sincerely,

Gloria Quiroga  
2001 Chisholm Trail  
Grand Prairie, Texas 75081  
(214) 641-8420

cc: Mr. Stripay



## SUMITOMO CORPORATION OF AMERICA

345 PARK AVENUE, NEW YORK, N. Y. 10154

Telephone  
(212) 207-0700

WU 1-2311  
TWX 710 581 4453  
Cable: SUMITOMO NEWYORK

Ms. Gloria Quiroga  
2001 Chisholm Trail  
Grand Prairie, TX 75081

January 29, 1987

Dear Ms. Quiroga:

We sincerely appreciate the concern you expressed in your letter to Mr. Taura of January 16, 1987. We, as you, would much prefer to have maintained a profitable and growing rolled steel business in our Dallas office. Unfortunately, that is not the case.

As you have indicated in your letter, seniority is a factor in many personnel decisions. However, as I hope you can understand, it is not the only factor that the company considers.

When faced with similar difficult situations involving departmental transfers and closings, our position has been to displace employees in those affected departments. While this is a difficult decision and of no consolation to you in your situation, it is necessary in order to avoid disruption to unaffected departments and their activities.

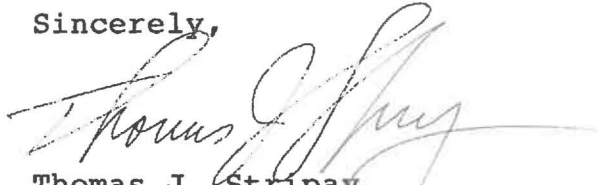
We deeply regret that declining business conditions resulted in the elimination of the Rolled Steel Department in Dallas of which you were a part. We also deeply regret that your employment with the company has been affected by the closure of the department.

Please be assured that you are fully vested under the terms of our pension program and will be eligible to receive a deferred vested pension benefit based on your years of service. More information regarding this benefit will be forwarded to you in the near future.

SUMITOMO CORPORATION OF AMERICA

If I can be of any assistance to you or if you have additional questions please let me know.

Sincerely,



Thomas J. Stripay  
Vice President-Human Resources

SECTION CODE #4		APPROVAL	SENDER'S NAME	TEL. EXT.	TELEX → OUTGOING	PAGE NO.
#1 CLASS/PRIORITY	#2 ADDRESS CODE (S) (COPY MUST BE XCOPY)			CABLE/TELEGRAM: CABLE ADDRESS OR FULL NAME & ADDRESS		
	<i>To: Elena Quiroga</i> <i>From: S. Yamahiro</i>			6-30-88		
ORIGINATOR CODE		REF. NO.	MONTH	DATE	FROM DALLAS	
• DAL SS						
1	<div style="position: relative; height: 100px; margin-bottom: 20px;"> <span style="position: absolute; top: 0; left: 0; font-size: 4em; transform: rotate(-45deg);">G</span> </div> <p>→ You might receive request from NY to review our tel. directory, which pls pass to me.</p> <p>2 To avoid <del>per.</del> That request to be made to me but because of tel. directory, NY made misunderstanding.</p> <p>Also we (Houston Office) will review total organization chart of Houston/Dallas office and please note</p>					
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23						
#1 CONFIDENTIAL		QS		SPECIAL ADDRESS CODES FOR SUPPLEMENT ADDRESS.		
1st PRIORITY		QU				
2nd PRIORITY		(No Indication)				
3rd PRIORITY		QD				
		SYTLX	LDTLX	BXTLX	OUR TELEX NOS.: (DOMESTIC)	
		OSNTT	TKTLX	TKNTT		

SECTION CODE #		APPROVAL	SENDER'S NAME	TEL. EXT.	TELEX → OUTGOING		PAGE NO.
#1 CLASS/PRIORITY	#2 ADDRESS CODE (S), (COPY MUST BE XCOPY)	CABLE/TELEGRAM CABLEADDRESS OR FULL NAME & ADDRESS					
ORIGINATOR CODE		REF. NO.	MONTH	DATE	FROM DALLAS		
• DAL SS							
1	<p>General affairs and Personnel affairs <del>will be</del> taken by myself only in this office, <sup>because of</sup> which <del>will be notified</del> tel. directory <del>to</del> <sup>will</sup> be changed as <del>follows</del> -</p>						
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#1	CONFIDENTIAL : OS	#2	SPECIAL ADDRESS CODES FOR SUPPLEMENT ADDRESS		OUR TELEX NOS. (DOMESTIC)		
	1st PRIORITY : QU						
	2nd PRIORITY : (No						
	Indication)						
	3rd PRIORITY : QD						
			SYTLX	LOTLX	BXTLX		
			OSNTT	TKTLX	TKNTT		

SUMITOMO CORPORATION OF AMERICA  
DALLAS OFFICE  
(214) 742-8104

YAMAHIRO, Shinichiro ..... 8104  
~~Manager~~ *Office Manager* (DALZA)

*General Affairs / Personnel* (DALZA)

Yamahi, Shinichiro ..... 8104

~~Quiroga, Gloria~~

0 Rolled Steel (DALGJ #14)

Yamahi, Shinichiro ..... 8104

Quiroga, Gloria ..... 8104

0 Aerospace & Electronics (DALKZ #92)

Nakao, Susumu ..... 8104

Sherburne, Joe ..... 8104

X Tubular Products (DALGA #8, #10, #11 & #12)

Azuma, Naoki ..... 8104

Lamey, Terri ..... 8104

~~Personnel (DALZA)~~

~~Yamahi, Shinichiro ..... 8104~~

~~Quiroga, Gloria ..... 8104~~

Receptionist

Nelson, Sunne ..... 8104

Telex

~~Perkins, Daniel~~ ..... 8104

*Ken*

TO: MR. H. YAMANE c/o NYKAD

9-25-86

PM 9-23-86

FROM DALZA

SUMITOMO CORPORATION OF AMERICA

DALLAS OFFICE

(214) 742-8104

2/

YAMAHIRO, Shinichiro .....	8104
Manager (DALZA)	
<u>General Affairs/Personnel</u> (DALZA)	
Yamahiro, Shinichiro .....	8104
<u>Rolled Steel</u> (DALGJ #14)	
Yamahiro, Shinichiro .....	8104
Quiroga, Gloria .....	8104
<u>Aerospace &amp; Electronics</u> (DALKZ #92)	
<del>Kimura, Joe</del> .....	8104
Sherburne, Joe .....	8104
<u>Tubular Products</u> (DALGA #08, #10, #11 & #12)	
Azuma, Naoki .....	8104
Lamey, Terri .....	8104
<u>Receptionist</u>	
Nelson, Sunne .....	8104
<u>Telex</u>	
Kendell, Murray .....	8104

→ NAKAWO, SUSUMU





# SUMITOMO CORPORATION OF AMERICA

345 PARK AVENUE, NEW YORK, N. Y. 10154

Telephone  
(212) 207-0700

WU 1-2311  
TWX 710 581 4453  
Cable: SUMITOMO NEWYORK

June 20, 1986

TO:

*Gloria Quiraga*  
*Dallas Office*

FROM: Personnel Department

RE: Telephone Directory Update

Please make any of the following changes which will occur in your office as of July 1, 1986. (see attached)

Personnel Changes  
Section Codes  
Accounting Numbers  
Telephone Extensions

Also, include any other changes you would like to appear in the directory. After completing this information, please return to the Personnel Department, attention Cora Manzo, by June 30, 1986.

Thank you for your cooperation.



1985

SUMITOMO CORPORATION OF AMERICA  
DALLAS OFFICE  
(214) 742-8104

YAMAHIRO, Shinichiro ..... 8104  
Manager (DALZA)

General Affairs (DALZA)

Yamahiro, Shinichiro ..... 8104  
Quiroga, Gloria ..... 8104

Rolled Steel (DALGJ #14)

Yamahiro, Shinichiro ..... 8104  
Quiroga, Gloria ..... 8104

Aerospace & Electronics (DALKZ #92)

Nakao, Susumu ..... 8104  
Sherburne, Joe ..... 8104

Tubular Products (DALGA #8, #10, #11 & #12)

Azuma, Naoki ..... 8104  
Lamey, Terri ..... 8104

Personnel (DALZA)

Yamahiro, Shinichiro ..... 8104  
Quiroga, Gloria ..... 8104

Receptionist

Nelson, Sunne ..... 8104

Telex

Perkins Daniel ..... 8104

*Gloria, then to all*

**SUMITOMO CORPORATION OF AMERICA**

HOUSTON OFFICE

1100 LOUISIANA, SUITE 1000 / HOUSTON, TEXAS 77002

MEMORANDUM

TO: All Employees  
Houston & Dallas Offices

FROM: T. Imagawa  
Senior Vice President  
and General Manager

DATE: December 29, 1983

SUBJECT: Promotions

I would like to announce the following promotions which are effective January 1, 1984:

1. Coordinator

Brenda Heard

2. Administrator

Gloria Quiroga

3. Senior Clerk or Secretary

Trevor Harvey

Angela Washington

Becky Thorpe

Ann Hayden

We appreciate the fine work these people have done this past year.

TI/jms

*This is just to show that I was  
considered a good secretary.*

## SUMITOMO CORPORATION OF AMERICA

DALLAS OFFICE  
717 N. HARWOOD STREET SUITE 51700 (LB 59)  
DALLAS, TEXAS 75201

DALLAS NUMBERS  
214-742-8104  
TELEX 73 2239  
CARLE SUMITHOJI

October 8, 1982

Love and Fun Department  
Southwest Woman  
Publication Office  
San Antonio, Texas 78216

Subject: "What A Golden Secretary"

Dear Sir:

I am a Japanese businessman who must travel 75% of the time. As a result, I rely heavily on my secretary.

When I first came to the states, it was difficult for me in many ways. My "Golden Gloria" helped to make the adjustment much easier.

She has always been ready to help me in any way. She has been totally reliable and has worked late whenever I needed her. She has truly been my right hand.

After six years in Dallas, I am returning to Japan. It's going to be very hard for me to say goodbye to Gloria.

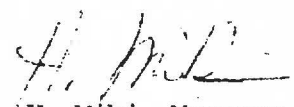
I would be especially happy if she could have this wonderful weekend as a small thank you to show my appreciation for her efforts. Her special kindness to me has made my stay in the United States a most pleasant one. I return to Japan with many fond memories and many new friends.

My secretary's name is Gloria Quiroga. She knows nothing about this. I wish I could be here to see her surprise if she wins, but I will be leaving for Japan on October 27th.

Thank you for considering my "Golden Secretary" in your contest.

Sincerely yours,

SUMITOMO CORPORATION OF AMERICA  
Dallas Office

  
Mr. H. Miki, Manager  
Steel Department

HM:js



SOUTHWEST AIRLINES CO.

P.O. Box 37611  
Love Field  
Dallas, Texas 75235  
(214) 353-6100

January 10, 1983

Ms. Gloria Quiroga  
SUMITOMO CORPORATION OF AMERICA  
717 N. Harwood Street  
Suite 1700 (LB 59)  
Dallas, TX 75201

Dear Ms. Quiroga:

Congratulations on being chosen the Southwest Woman "Golden Secretary"! The following information will help you make the most of your golden second prize package.

Enclosed are Love Tickets for two to travel to any city Southwest Airlines flies from Dallas Love Field. Please refer to the enclosed flight schedule for times; once you have decided when and where you want to fly, call the local reservations number to make your arrangements. Please plan to complete your trip by March 15, 1983, the expiration date on your tickets.

Please contact Mr. Duffy Keys, Director of Marketing at The Lincoln, at (214) 934-8400 to make arrangements for your guest room at The Lincoln. Dinner for two will be provided in The Spinnaker restaurant.

Mr. Don Borlie, Marketing Director of Adelstein Corporate Sales will arrange for you to receive your four-piece leather ensemble. He may be contacted at (214) 980-1012.

We feel your boss is also a winner to have such a capable, efficient, "good as gold" secretary. We hope you enjoy your gifts, and that your trip is a relaxing and memorable one for you and your guest.

Sincerely,

Judy Christa  
Director of Promotions

cc: Don Borlie - Adelstein Corporate Sales  
Duffy Keys - The Lincoln Radisson