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COSTCO WHOLESALE CORPORATION

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

(SAN FRANCISCO DIVISION)

SHIRLEY "RAE" ELLIS, on behalf of herself and all others similarly situated, Plaintiffs, v. COSTCO WHOLESALE CORPORATION Defendant.	Case No. C04 3341 MHP **DECLARATION OF MARGARET STOCKDALE, PH.D., RE SECOND REPORT SUBMITTED IN OPPOSITION TO PLAINTIFFS' MOTION FOR CLASS CERTIFICATION** Date: November 6, 2006 Time: 2:00 p.m. Courtroom: 15 Judge: Marilyn Hall Patel

I, Margaret Stockdale, declare:

The following declaration is identical in substance to my second report titled "Gender Differences in Job Attribute Preferences" (August 21, 2006), except that it has been placed in declaration form, with only some changes in formatting and pagination.

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I. Scope of second report

I have been retained by the law firm Seyfarth Shaw, counsel for defendant in *Ellis v. Costco*. I have been asked to review and analyze the second report by Dr. Barbara Reskin with regard to her opinions that (a) I misstated well-established scholarship on cognitive bias and sex stereotyping, understating the likelihood and adverse effects of sex stereotyping, (b) I ignored the fact that only certain kinds of individuating information can reduce the effects of sex stereotyping on women's career outcomes, and that I ignored evidence that employers' personnel practices can mitigate the effects of sex stereotyping and ingroup favoritism; and (c) I exaggerated the importance of family roles for women's career preferences, relying on dated, poorly designed and irrelevant research findings, that I ignored the fact that workers' job preferences change over time, partly in response to opportunities open to them, and that I overstated the role of worker's preferences on women's presence in customarily-male management jobs. To prepare this report, I reviewed my original report (Stockdale, June 22, 2006); Dr. Reskin's second report; her deposition; Dr. Frank Landy's deposition; my deposition; Dr. Saad's rebuttal report and exhibits; and additional research on sex stereotyping and gender differences in relocation propensity. I also obtained and analyzed data from the 2002 Family and Work Institute's National Survey of the Changing Workplace.

II. Summary of Opinions

1) Cognitive bias and sex stereotyping, although important explanations for various problems that working women experience, do not appear to be likely explanations for the relative disparity in promotion rates of Costco female managers to AGM and GM positions

2) Theories of sex- and gender-typing and related concepts of male dominance and tokenism are not likely explanations for the distribution of male and female managers in the four senior staff management positions at Costco, or the relative paucity of women in merchandise manager positions in particular.

3) Cognitive bias and sex stereotyping is not a likely explanation for the relative paucity of women in AGM and GM positions because the statistical analyses do not indicate significant gender differences in promotions to these positions.

4) The social science research that addresses the nuances of individuating information on reducing the effects of cognitive bias has limited applicability to conditions at Costco. Nonetheless if the principles derived from this body of research are relevant, conditions at Costco favor the conditions that permit the stereotype-reducing effects of individuating information to occur.

5) Gender differences in job attribute preferences persist in the 21st century even among those in managerial professional careers. Family roles account for some of these differences, but some gender differences are independent of family structure issues.

III. The adverse effects of cognitive bias and sex stereotyping

Opinion 1: Cognitive bias and sex stereotyping, although important explanations for various problems that working women experience, do not appear to be likely explanations for the relative disparity in promotion rates of Costco female managers to AGM and GM positions.

Dr. Reskin argues that my book *Women and Men in Organizations* (Cleveland, Stockdale & Murphy, 2000) contradicts most of my opinions about sex stereotyping and supports her opinions about the adverse effects of sex stereotyping on women's careers. She asserts that "sex stereotyping contributes to sex-typing of jobs which perpetuates job segregation and devaluation of women's work" (p. 2, ¶ 3); that tokenism affects women's visibility in organizations, exaggerates gender differences and minimizes similarities; that "'lack of fit' exacerbates sex stereotyping" (p. 2 ¶ 4), and that because management is associated with male attributes, it spells trouble for women (p. 2-3, ¶ 5).

I do not deny, misstate, or understate the importance of cognitive bias and stereotyping and its potential for adverse effects on sex stereotyping. There is nothing in my book

(Cleveland, Stockdale & Murphy, 2000), other writings or other testimony that contradicts my opinions in this case. Instead, I apply a reasoned analysis of conditions that are known to affect cognitive bias and sex stereotyping to the particular facts or evidence about the practices and conditions at Costco and conclude that sex stereotyping/cognitive bias is not a likely explanation for the distribution of women in upper-level warehouse management positions in Costco.

I discussed four predictions of patterns to be expected if cognitive bias and sex stereotyping were operating on a systematic, organizational wide basis to affect a broad class of women at Costco: (a) paucity of women promoted to any of the senior-level managerial positions; (b) greater gender disparities in higher warehouse managerial ranks (i.e., in promotions from AGM to GM); (c) statistically significant sex differences in job performance ratings favoring men; and (d) significant differences in salaries of managerial staff favoring men. As I stated in my earlier report, none of these patterns were apparent at Costco. Below, I clarify points (a) and (b) because they appear to be misunderstood or misconstrued by the opposing counsel and their experts.

A. *Relative paucity of women promoted to any senior-level managerial position*

Opinion 2: Theories of sex- and gender-typing and related concepts of male dominance and tokenism are not likely explanations for the distribution of male and female managers in the four senior staff management positions at Costco, or the relative paucity of women in merchandise manager positions in particular.

I hypothesized that if stereotyping and cognitive bias were widespread throughout Costco, one would expect to find relatively few women in any of the senior-level managerial positions – all of which are deemed important for promotion to AGM and GM.[1] I noted that both the plaintiffs' and defense's statistical experts found no significant gender disparity in three

[1] Both Dr. Saad's and Dr. Drogin's analyses shows that although experience as Merchandise Manager is the most critical senior staff position for promotion to AGM and then to GM, experience in at least one other, and most likely all other senior staff positions is important. All four senior staff positions can be considered "line" management positions because of their importance to the central operations of the Warehouse and because they all serve as pipelines to upper level warehouse management.

out of the four senior staff positions. In response to my statement that it is "far-fetched to conclude that there is distinctive gender-typing among [staff manager] positions" that would account for gender disparities in promotions to Merchandise Manager positions, a good deal of attention was paid in Dr. Reskin's second report, my deposition, and Dr. Landy's deposition regarding the definition of gender typing, male-dominated occupations and tokenism (Stockdale Costco report, 2006, p. 12). This concept is clarified below.

Gender typing is a concept used by psychologists and sociologists to help understand gender-related disparities in the workplace. The assumption is that if jobs are gender typed, then various biases may operate to keep the opposite gender out of the occupation. Glick (1991) distinguished between *gender-typing*, the perception that various gender-related traits align with different types of jobs (e.g,. the perception that construction worker jobs require strength and virility – stereotypically masculine traits – vs. the perception that nursing requires warmth and compassion – stereotypically feminine traits), and *sex-typing*, the relative distribution of men and women in various occupations. Occupations in which the majority (no specific value is given) of incumbents are men, may be perceived or labeled as male-sex-typed, and similarly for female-sex-typed occupations. His study demonstrated that although people tend to perceive that male sex-typed jobs are associated with requisite masculine traits and similarly that female sex-typed align with feminine traits, there were a number of androgynous[2] traits associated with both types of sex-typed jobs, as well as some cross over of feminine and masculine traits to opposite-sex-typed jobs. Thus, standards for judging sex-typed jobs do not perfectly align with stereotypical impressions of those jobs.

Heilman (1983) incorporated concepts of gender/sex typing of jobs in her lack-of-fit model to help explain gender bias against women in managerial jobs. Relying on studies showing that the stereotype of a non-descript management job is more similar to stereotypes of men in general than of women in general, Heilman and others concluded that management tends

[2] Traits that are associated with both masculinity and femininity.

to be a male gender-typed job. Because of the perceived incongruity between the general female stereotype and management stereotyped (as being masculine), Heilman hypothesized that without information to the contrary (i.e., individuating information), women would be judged as less competent for the position than would men. Indeed, her research, much of which is laboratory based, tends to support this hypothesis.

Another line of research has posited that in male or female sex-typed jobs, a concept known as "sex-role spillover"exists, in which traditional, non-work-related female gender-role expectations become enmeshed with the work role for women (Gutek & Morasch, 1982). Under these conditions, the probability that women will be perceived and treated as sex objects increases, which increases the risk of sexual harassment and other forms of discrimination. Although sex role spillover was originally believed to occur in situations where the majority (no specific percentage was given) of job holders were male *or* female, further research has found that the hypothesized effects of sex role spillover tend to occur only in male-dominated work environments, more so in blue-collar environments than in professional occupations (Ragins & Scandura, 1995), and more so in sexualized work environments (e.g., work environments in which there is an abundance of sexual talk and sexual materials; Gutek, 1985).

In this line of research, sex or gender-typing of the workplace or occupation has not been uniformly defined. For example, O'Hare and O'Donohue (1998), created an index of gender dominance by calculating the difference between the percent of women in the respondent's job environment and 50, such that a score of 0 represented a completely integrated and non-sex-typed job, and a score of 50 represented the predominance of one gender (male or female). Burgess and Borgida (1997) merely represented jobs as traditionally or nontraditionally female in their study of sex role spillover. Dr. Reskin even concedes that there is no method for objectively classifying a position as male dominated (Reskin deposition, p. 234:19-21)

A third context in which sex-typing of jobs has been investigated is tokenism, a concept first articulated by Rosabeth Moss Kanter in her landmark ethnography, *Men and Women of the*

Corporation (1977). Kanter proposed that numerical scarcity, that is being in a minority of 15% or less on the basis of a "master status," such as race or sex, had particularly ill effects: heightened visibility (every move scrutinized), boundary heightening (isolated and viewed as "opposite"), and role encapsulation (expected to fulfill traditional roles). Kanter's ideas were original, provocative, and heuristic – that is, they stimulated a lot of research. Much of this research has found that numbers alone do not fully account for the effects of tokenism. For example, some research has found that male tokens are treated more favorably than men who are not in a token status (Yoder & Sinnett, 1985), or just as well as female dominants (e.g., nurses; Fairhust & Snavely, 1983). Yoder (1991) noted that numerical paucity alone is not sufficient to explain gender discrimination and related effects, but that factors such as normative gender typing (expectations about appropriate gender-related behavior on the job), gender pioneering (being among the first of one's gender to enter an occupation), and intrusion (an influx of women into a previously male-dominated occupation) are important factors as well. In addition, research has found that status and legitimacy matter too. Yoder, Scheicher and MacDonald (1998), for example, found that none of the ill effects of tokenism were experienced when "token" women were perceived by group members as having been legitimately selected for a group and having the requisite expertise needed. McDonald, Toussaint, Schweiger (2004) discovered that female tokens who had higher status (older, more educated) than the all male group they were going to lead, experienced less performance pressure, less anxiety, and greater confidence, comfort and perceived effectiveness than female tokens whose status was similar to the group they were leading.

Taken together, these studies demonstrate that numbers alone do not necessarily create the ill-effects of tokenism that Kanter (1977) conceived or of sex-role spillover that Gutek and Morasch (1982) hypothesized. There are many other factors that may exacerbate as well as alleviate problems with tokenism and sex-role spillover, and thus one cannot conclude that mere numerical paucity alone is a decisive source of stereotyping and discrimination. Social scientists

look at numerical ratios as a starting point in the analysis of stereotyping processes; not the end point.

B. *Gender Disparities from AGM to GM*

Opinion 3: Cognitive bias and sex stereotyping is not a likely explanation for the relative paucity of women in AGM and GM positions because the statistical analyses do not indicate significant gender differences in promotions to these positions.

If stereotyping and gender bias were widespread and systematic throughout Costco, I hypothesized that one would expect to see even greater disparities in promotions from AGM to GM positions. I hypothesized this on the basis of the glass ceiling phenomenon where one tends to find a dramatic decrease in women in upper-level management positions, compared to first-line and middle-level management positions as well as the potential for tokenism effects to occur in upper-level management, notwithstanding the concerns I discussed above about simply using numbers to define tokenism. Dr. Drogin's analysis, however, indicates that there is no statistically significant difference in the promotion rates of male and female AGMs to GM positions. Nonetheless, it appears that opposing counsel and their experts persist in believing that there are. For example, in my deposition, opposing counsel asked me to agree that women in GM positions qualified as "tokens" using Kanter's (1977) definition of tokenism (Stockdale deposition, 135:14-17); in Dr. Landy's deposition, opposing counsel questions him about the extent to which warehouse manager (GM) positions are male dominated (Landy deposition, 26: 20-21). In Dr. Reskin's second report she focuses on the potential for biased social information processing on the part of regional executives who are responsible for selecting AGMs and GMs (pp. 4-5, ¶ 12) and their lack of accountability when they select AGMs and GMs (p. 6, ¶¶15, 17).

Leaving aside the veracity of her claim of no accountability, it is apparent that Dr. Reskin and opposing counsel are focusing on a problem that doesn't exist. The plaintiffs' statistical expert himself notes that there is no disparity in promotion from AGM to GM. Accordingly, even if district and regional executives are not accountable for their decisions, their decisions do

not reflect any cognitive bias or stereotyping in these promotion decisions. In addition, Dr. Saad's analysis has demonstrated that if experience in merchandise management plus at least one other staff-level management position is accounted for, there is no disparity in promotion from staff management to AGM. Thus, again, there is no evidence that cognitive bias is operating to keep women out of AGM positions if they have merchandise management plus at least one other staff management experience.

IV. The effects of individuating information on reducing effects of sex stereotyping

Opinion 4: The social science research that addresses the nuances of individuating information on reducing the effects of cognitive bias has limited applicability to conditions at Costco. Nonetheless if the principles derived from this body of research are relevant, conditions at Costco favor the conditions that permit the stereotype-reducing effects of individuating information to occur.

Dr. Reskin opines that Dr. Landy and I ignored evidence "that only certain kinds of individuating information can reduce the effects of sex stereotyping on women's careers" (p. 1, opinion II). She states, among other things, that when "decision-makers are busy, under time pressure, or their cognitive resources are otherwise taxed, they are less able to attend to many details and hence are more likely to base decisions on stereotypes" (p. 5, ¶ 13). She also notes that "sex stereotypes are activated when participants have high cognitive demands and little incentive not to stereotype" (p. 5, ¶13).

Researchers in the field of social cognition have conducted extensive research to reveal how stereotypes operate, including how other information affects the cognitive processing of stereotype information. Hunt, Borgida, Kelly and Burgess (2002) summarized much of this research in a persuasive chapter written for the legal profession. Dr. Reskin relied extensively on this chapter in her second report to challenge my claim that managerial practices, such as the warehouse walk,[3] provided sufficient individuating information to reduce, if not eliminate, any

[3] Costco's counsel provided me with examples of statements made in several depositions of Costco managers that described how Costco employees were identified as promotable, coached, and selected for senior-level warehouse

potential effects of stereotyping. A careful review of the research that Hunt et al reviewed and that by extension Dr. Reskin relied on finds it to be less persuasive than Hunt et al. and Dr. Reskin imply.

The social cognition literature on which Hunt et al., (2002) and Dr. Reskin base their opinions relies extensively, if not exclusively, on laboratory studies, using undergraduate students who are responding to carefully controlled information about imaginary persons about whom they are asked to form a judgment or respond to trait information. The extent to which the results of these studies generalize to workplace situations like that of Costco is unknown. Nevertheless, I discuss several of these studies below.[4]

A. *Critical discussion of research on individuation and stereotyping*

Dr. Reskin cites Goodwin, Operario and Fiske (1998) to support her claim that stereotyping remains potent even in the face of individuating information if the decision maker is busy, under time pressure, or cognitively taxed. The Goodwin et al. study does not address any of these issues. Instead, they focus on the role of the decision maker's power over the target either by being able to control important outcomes for the target, or by having an extremely dominant personality style. Under these conditions, decision makers attended to stereotype-consistent information about the target more so than stereotype-inconsistent information. However, Goodwin et al. suggest that if powerholders are dependent on their subordinates for their own outcomes, (for example their rewards are dependent on employees' productivity), then the effect of power on ignoring individuating information may be substantially reduced. At Costco, staff managers, AGMs and GMs are responsible for the productivity of their units upon which regional executives' job performance is measured. In an organization like Costco, where

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management positions (i.e., senior staff managers, AGMs and GMs). I have reproduced this list of examples as exhibit A. It is not simply the warehouse walk that provides sufficient individuating information, but also the fact, among other things, that AGMs and GMs have significant input on the selection of senior staff managers and AGMs, and that GMs also have significant input on the promotion of any of their staff to other AGM or GM positions in the company. Moreover, warehouse staff managers typically enjoy a long tenure with Costco which provides ample opportunity for upper-level warehouse managers to get to know them well.

[4] I did not selectively choose these particular studies, referenced by Hunt et al and purposefully ignore other studies that were cited. These were the studies that I could most easily retrieve at the time I was preparing this report.

senior managers can meet their goals only through the efforts of their subordinates, then the relevant subordinates (i.e., staff managers, AGMs, or GMs), who are the targets of Costco "powerholders" (i.e., GMs, regional executives), should have sufficient counterpower to counteract stereotyping tendencies (or the tendency to ignore individuating information). To the extent that this characterization is accurate[5], as it would be in most business environments, "powerholders" would be remiss if they did not attend to individuating information about their subordinates.

Dr. Reskin notes that "only unambiguous individuating information can override stereotypes" (p. 4, ¶ 12). Kunda and Sherman-Williams (1993) addressed this issue by having undergraduate students read one of two ambiguous scenarios which simply stated "a housewife (construction worker) hit someone who was annoying her (him)." Participants in a pilot study generated possible stories about this situation, and these stories or "construals" were rated by others on their level of aggressiveness. A second group of undergraduates then read one of six versions of the story: (a) the original "ambiguous" stories of either the housewife or construction worker; (b) a revised story of the housewife or construction worker with an aggressive construal [i.e., the construction worker's (housewife's) neighbor was taunting him (her) about his (her) marriage and finally the construction worker (housewife) lost his (her) temper and decked the neighbor]; or (c) a revised story of the housewife or construction worker with a very non-aggressive construal [i.e., the construction worker (housewife) spanked his (her) six year old son when he trudged mud all over the carpet. He (she) then regretted his (her) action and comforted his (her) son]. The participants then rated how aggressive they felt the person in the story was. In the original ambiguous stories, the construction worker was rated as more aggressive than the housewife, suggesting that participants relied on their stereotypes of these social categories to arrive at their judgments of aggressiveness. However, in the aggressive construal condition, both the housewife and construction worker were rated as equally aggressive and in the non-

[5] See exhibit A, attached.

aggressive construal the housewife and construction worker were rated as equally non-aggressive. The study was replicated with stories of a librarian or car salesman attending a party with participants asked to rate their level of extroversion. Reskin argues that individuating information has to be very non-ambiguous to override stereotyping. This study shows, however, that a simple construal – a brief story that explains an act – is sufficient to override stereotyping. Imagine what day-to-day interactions with employees over several years may do to override stereotyping.

Reskin argues that "irrelevant information can increase the impact of sex stereotyping if it makes the person seem more like a 'typical man' or 'typical woman,'" (p. 4, ¶ 12), referencing Hunt et al. (2002) for this assertion. Hunt et al. cite a number of social cognition studies to support this and related claims that perceivers may selectively attend to stereotype-consistent information and ignore stereotype inconsistent information. For example, in a study by Bodenhausen (1988, cited by Hunt et al.), undergraduates were asked to read various statements about a criminal defendant, one third of which were exonerating, one third were neutral, and one third were incriminating. Only when they were told the defendant had a Hispanic name (compared to a non-descript name) did selective processing of the evidence occur (participants paid more attention to the incriminating information and less to the exonerating information). In other words, priming the stereotype of "Hispanics" led to biased processing. A similar Dutch study by Dijksteruis and van Knippenberg (1996; also cited by Hunt et al.) found that when undergraduates engaging in a computerized word recognition task were primed with a stereotype category (soccer hooligan or professor), their ability to respond to trait-consistent terms was faster or more accurate and their ability to respond to trait-inconsistent terms was slower or less accurate than undergraduates serving in a control (non-primed) condition. In other words, participants in both of these studies were given information that a fictitious stimulus person was of some particular social category (Hispanic, soccer hooligan or professor) and then asked to recall information about the target or respond to computer-presented trait terms. Under these

conditions, priming a single, salient social category in a laboratory situation led to biased processing of further information. I do not dismiss the importance of these and related studies in isolating factors that affect social information processes. They provide directions for further study to examine how stereotyping processing operates in "real world" environments. I do believe, however, that they provide little guidance in understanding how Costco managers and executives process information about their staff.

V. Quality of research examining the importance of family roles for women's career preferences and willingness to relocate.

Opinion 5: Gender differences in job attribute preferences persist in the 21st century even among those in managerial professional careers. Family roles account for some of these differences, but some gender differences are independent of family structure issues.

Dr. Reskin criticizes my review of research on family roles and women's career preferences, arguing that I exaggerate the importance of family roles, ignore changes in workers' preferences over time, and that I rely on old or poorly conducted research to form my opinions.

A. *Quality and characterization of the research on the influence family and gender roles on women's career decisions*

Dr. Reskin has misread or mischaracterized my report. As Dr. Reskin is aware, social scientists use a variety of research methods including national probability surveys, representative sampling, snowball sampling, and convenience sampling – the latter are especially likely when the area of inquiry is new, the population the study is focused on is hard to reach via random sampling (such as business managers or executives), or funding sources are few. In my original report, I reviewed historical as well as very recent research on the importance of family roles and gender role socialization, much of which Dr. Reskin herself acknowledges as important, to give the reader a context in which to understand how the impact of these factors has or has not changed throughout the past few decades. This is clearly indicated in my report. I reviewed studies on the division of home and work labor in a chronological order, providing the dates of

the data collection so that the reader could discern the trends in the research findings from the 1970s (e.g., Bielby & Bielby, 1989) to the 21st century (e.g., Bond et al., 2002) – most of which used national household probability samples. My review indicates that although there have been noticeable changes in the division of household and paid work labor, our society remains far from egalitarian.

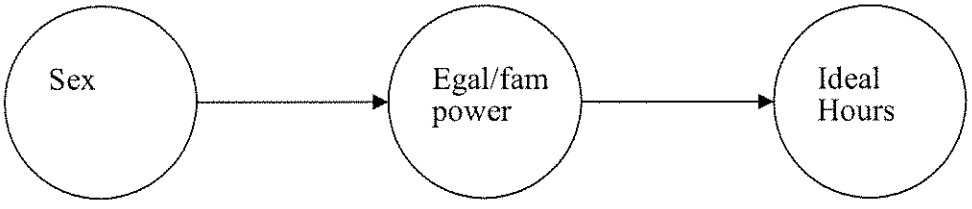
To further examine the question as to whether gender differences in work preferences persist in the 21st century among managerial women and men, I analyzed data from the 2002 National Study of the Changing Workforce (NSCW; Bond et al., 2002). In my original report, I relied on the Family and Work Institute's (FWI) published report of these data. That report only examined trends in the U.S. workforce overall and did not report results specifically for managers or professionals. For the purpose of this second report, I obtained the 2002 public use data file from FWI, which represents a national random sample of working adults over age 18 (n=3504), and selected respondents who were wage or salary earners for private, for-profit employers and whose occupations were classified as managers or professionals. The final sample size was 488 (56.6% men; 91.5% full time). Although this data set contains extensive information about work and non-work (e.g., family) issues, there were only a few questions about job attribute preferences that were relevant to this case: The number of hours the respondent would ideally like to work and whether those who work full time would prefer to work part time. I analyzed the extent to which male and female managers and professionals deferred in their preference for ideal work hours and for part-time vs. full-time work, and if so, whether family-related variables or other reasons may explain these differences.

1. *Male and Female Managers/Professionals preferences for ideal working hours*

Male managers and professionals preferred significantly more working hours than did female managers/professionals (M_{men}=37.51, SD=15.75; M_{female}=32.05, SD=13.24; t(df=482)=4.05, p<.001). I computed a correlation matrix between ideal hours, gender, and a

variety of potential explanatory variables (e.g., family structure, egalitarian attitudes, family power and other human capital variables). This correlation matrix is provided in Table 1. In addition to gender, ideal working hours was significantly related to measures of egalitarian attitudes, and family power (operationalized as the percent of respondent's income of the total household income; e.g., Eby, 2001), but not to family status variables (e.g., marital status, number of children, or age of youngest child). Female managers/professionals tended to have stronger egalitarian attitudes, fewer children, less education, and less family power compared to male managers/ professionals.

This correlation matrix indicates that family status cannot explain gender differences in ideal working hours, because the family variables were not related to ideal work hours. However, it is possible that egalitarian attitudes or family power may explain gender differences. To explore this possibility, I conducted a mediation analysis (Baron & Kenny, 1986), which follows a 3 step process: (a) show that the independent variable (sex or gender) is related to the dependent variable (ideal work hours) and to the mediator (explanatory) variables (egalitarian attitude, family power); (b) show that the mediator variables are related to the dependent variable; and (c) show that when the independent variable is statistically controlled, it is no longer significantly related to the dependent variable, but that the mediator variable remains significantly related to the dependent variable. Graphically, mediation looks like this:



Step (a) is satisfied by examining the correlation matrix Table 1: Sex is significantly related to ideal work hours ($r=.17$, $p<.05$), egalitarianism question 1 (Disagree that men should work and women should stay at home), as well as a scale composed of the average of the two egalitarianism questions (EGAL),[6] and to family power. Step (b) is also satisfied by the correlation matrix: EGAL and Family Power were significantly correlated with Ideal Work Hours ($r=.10$, $p<.05$; $r=.17$, $p<.05$, respectively). Step (c) is tested with multiple regression. The independent variable is entered into an equation predicting ideal work hours, followed by the mediator variables in the second step of the equation. If sex is no longer significant after the mediator variables are entered, but the mediator variables remain significant, full mediation is demonstrated. Although human capital variables, such as age, years in workforce and level of education were not significantly related to the dependent variable, ideal working hours, these variables were included as control variables in the analysis. The results are provided in Table 2.

This analysis demonstrated that, contrary to expectations, egalitarian attitudes and family power did *not* mediate the gender difference in ideal working hours. The gender difference persisted despite the inclusion of the control variables and the potential mediating variables. Therefore an additional analysis was conducted to determine whether egalitarian attitudes, family power, as well as the family structure and personal income variables were differentially related to ideal working hours for male and female managers/ professionals. This analysis, called moderator analysis, is reported in Table 3. The analysis was conducted by regressing ideal working hours on the interaction of sex by each of the potential moderator variables in separate analyses.[7] The variables composing the interaction are entered in the equation first followed by

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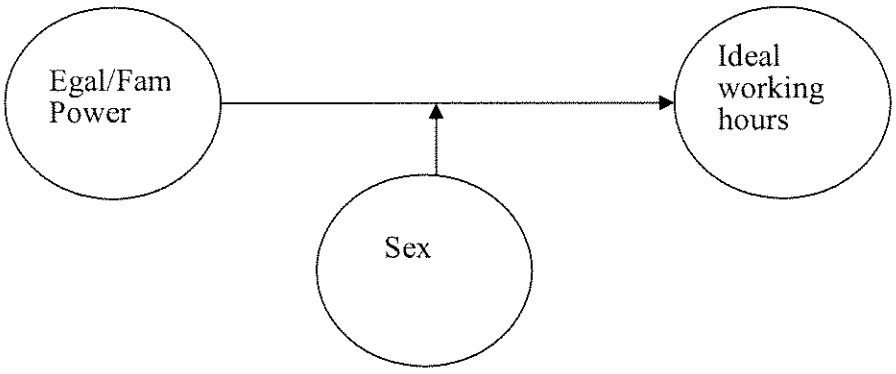
[6] The second egalitarian question was reverse scored so that a high score indicates a pro-egalitarian attitude. Then the responses to the two questions were average to create the egalitarian index (EGAL). The internal consistency of this scale was low ($\alpha=.58$) as would be expected from a 2-item scale, therefore I analyzed the items separately in addition to the EGAL index.

[7] I centered the continuous variables before computing the interaction terms by subtracting the mean score from the raw score.

the interaction term. A graphic representation of moderation analysis looks like this,



such that the relationship between either egalitarian attitudes or family power and ideal working hours may be different for women and men.

As shown in Table 3, egalitarian attitudes and family power significantly interacted with sex to predict work hours. The family structure variables (marital status, number of children and age of youngest child) and personal income did not interact with sex. To interpret the significant moderator effects, correlations between egalitarian attitudes and family power were conducted separately for male and female managers/professionals. This analysis indicated that egalitarian attitudes was *not* significantly correlated with ideal working hours for men ($r=-.02$, ns), but was significantly correlated for women ($r=.15$, $p<.05$), indicating that for women only, having an egalitarian attitude about gender roles predicted a desire for greater working hours. Conversely, family power was significantly correlated with ideal working hours for men ($r=.20$, $p<.05$), but not for women ($r=-.07$, ns), suggesting that the more power men have in their families (as reflected by earning a greater percentage of the family income), the more hours they desire to work. Family power did not predict the job preference for women.

2. *Full-time male and female managers'/professionals' preference for part-time schedule*

In the NSCW database, restricted to managerial/professional employees who worked for a private, for profit employer *and* who worked full time (n=434), respondents were asked if they preferred to work part time (part-timers were asked if they preferred to work full time, but part-

timers were excluded from this analysis). Responses were recorded such that "1" equaled "yes" and "2" equaled "no." Female managers/professionals working full time were significantly more likely to desire part-time work than their male counterparts (M_{male}=1.92, SD=.27; M_{female}=1.76, SD=.43; t(df=433)=4.66, p<.001)[8]. Among men, preference for part-time work was related to family power (r=.15, p<.05), such that greater family power was associated with not desiring part-time hours. For women, preference for part-time work was unrelated to family power (r=.06, ns), but was significantly related to egalitarian attitudes, including the egalitarian composite scale (r=.30, p<.001) as well as each of the variables composing the composite [Egal 1 (disagree that men work, women stay at home), r=.27, p<.001; Egal 2 (agree that working moms have good relations with kids), r=.21, p<.001].

3. *Summary of findings from the analysis of NSCW 2002 survey.*

Dr. Reskin criticized my report for relying on out-dated or poorly conducted, non-representative research to support my conclusions that gender differences in job-attribute preferences existed and could potentially explain why female Costco managers may have less preference for Merchandise Manager jobs, with their difficult hours, than do men. Moreover, plaintiffs' counsel, Jocelyn Larkin, implied in questions asked of me in my deposition, that research findings of this nature based on samples of working individuals in general may not apply to ambitious male and female managers who work long hours already, such as all four senior-level staff managers at Costco (see, for example, Stockdale deposition, pp 189-191). To respond to this criticism, I obtained data from the 2002 National Survey of the Changing Workforce to determine whether such gender differences persisted in the 21st century among male and female managers and professionals employed in for-profit industries – a sample more similar to Costco management than studies based on the general population. I found that female managers/professionals' ideal number of hours was significantly less than males' and that family structure (e.g., number of children, age of youngest child) did not explain this difference, nor did

[8] Alternatively, this question can be analyzed with a 2 (sex) X 2 (prefer part-time: yes/no) contingency analysis, $\chi^2(1) = 20.17$, p<.001.

any other control or mediator variables. In addition, female managers/professionals who worked full time preferred to work part time more so than did full-time male managers/professionals.

The extent to which one possessed power in the family unit, as reflected by earning a greater proportion of the household income, was related to preference for working a greater number of hours and for continuing to work full time for men, but not for women. These findings support the theory that men perceive their work role to be primary to their family identity (e.g., Bielby & Bielby, 1989) – the more power they possess in their family, the more they want to work Although men's family power was stronger than women's (see Table 1), it did not explain the gender difference in ideal working hours. For women, egalitarian attitudes appeared to be an important predictor of desiring greater working hours and maintaining a full time job. This finding is consistent with the interpretation that as gender role attitudes toward egalitarian work roles continue to improve, women will prefer to work longer hours. These attitudes appear to be independent of their family responsibilities, at least among managerial/professional women.

Thus, gender differences in job preferences for work hours and work schedules (part time vs. full time) persist even in modern samples of managerial women and men. Moreover, these differences are not explained by family structure variables or by other traditional human capital variables. Such gender differences in ideal hours and for working part-time truly appear to be a preference more so than a constraint. Dr. Reskin implies that organizational factors can signal one's perception of job attribute preferences (Reskin deposition, p. 235: 7-9; p. 236: 20-21) but also concedes that forces outside the workplace can act as signals for such preferences (Reskin deposition, p. 238: 13-17; p. 239: 3-4). Research on recently collected random sample of working adults in the United States, restricted to managers and professionals working for for-profit employers, such as the research results I just presented, suggests that preferences do indeed emanate from forces outside any one workplace.

B. *Quality and representativeness of research on gender differences in relocation and occupational mobility*

Dr. Reskin criticizes my reliance on two studies to demonstrate gender differences in willingness to accept managerial positions requiring relocation. Again, she mischaracterizes my report. I clearly stated that I highlighted both a "classic" study of gender issues in relocation preferences (Bielby & Bielby, 1992 – which analyzed 1977 data), and a very recent study (Baldridge et al., 2006). These studies are well designed and published in high quality, peer-reviewed journals. Reskin criticized the Baldridge et al study because it relied on snowball sampling, and because their measure of willingness to relocate was problematic (see Bates #: BR 000096-BR 000097). As mentioned previously, snowball sampling is often used when the target population is difficult to reach via national random sampling methods. Managers are a hard sample to reach (note that in the NSCW study discussed above, considerable effort was expended to obtain a sample of 3,504 working adults and of these only 488 were managers and professionals). Although Baldridge et al.'s sample of 666 managers was not random, it did represent managers from 102 companies and 26 industries, therefore reasonable generalizations are warranted. In addition, the measure of willingness to relocate was based on a previously published scale (Landau, Shamir & Arthur, 1992) in which respondents indicate their willingness to relocate for five reasons (going to a better job, going to an equal job due to reorganization, remain with the company, for a developmental assignment for one to three years, and if skills were needed elsewhere), and Baldridge et al., added one more item (because one's job is being phased out at the current location). Respondents indicated their willingness to relocate on a scale of 1 (not willing) to 5 (very willing). A principal components factor analysis was conducted with varimax rotation which found that all six items loaded on a single factor. This means that answers to all six items are a function of one underlying trait or construct. In addition, the internal consistency of the scale was high (Cronbach's alpha = .83). It is evident from their study that Baldridge et al. summed participants' responses to the six items to create an overall

score for willingness to relocate.[9] Baldridge et al.'s scale, therefore, met accepted psychometric standards for validity and reliability.

Moreover, there have been many studies published in the last few decades that have examined gender and family role factors related to relocation. A more thorough review yields the same conclusions: women and men tend to differ in their willingness to relocate, and women's relocation decisions are more contingent on family considerations than are men's. Below, I review five additional studies on organizational mobility, and relocation issues. These studies vary in quality and timeliness, but the conclusions are consistent with the observation that men generally express greater willingness to relocate than do women, and that family-related reasons more negatively affect women's relocation decisions than they do men's.[10]

Studies that have relied exclusively or almost exclusively on male samples tend to find no effect of family or spouse variables on relocation decisions. Gould and Penley (1985), in their study of 192 male employees of a large southwestern municipal organization, found that willingness to relocate was negatively related to having an employed spouse, but was not related to family status (having children or not). Noe and Barber (1993), in their study of 270 professional and technical almost exclusively male employees of a Midwestern state agency, found that willingness to locate was *not* significantly related to number of children, marital status, spouse's income, nor community involvement. Brett, Stroh and Reilly (1993), in their study of 827 randomly selected employees from 20 *Fortune* 500 companies who had relocated at least once recently (78% male), found that sex, race and number of children did *not* affect willingness to relocate. For married respondents, spouse's willingness to relocate was positively related to one's own willingness to relocate. Brett et al., did not conduct analyses separately by

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[9] See the means and standard deviations report in Table 1 of Baldridge et al. – the mean of "Willingness to Relocate for men is 18.9, and for women, 17.1, which are in the theoretically plausible range of 6-30 if one is summing responses on a 1-5 scale over 6 items.

[10] To simplify the discussion, I do not report on significant predictors that are not relevant to the discussion of family or gender roles in relation to mobility. For example, age is almost always negatively related to mobility (younger adults move more than older adults), and various attitudes, such as job satisfaction and organizational commitment, are often negatively related to inter-organizational mobility. Where possible, I report the significant predictors that emerge in a multiple regression (or related analysis) after control variables are accounted for.

gender, therefore, they did not test whether the influence of children had differential effects on willingness to relocate for women and men.

Studies that have included more women as well as men in their samples and have analyzed gender effects tend to find stronger influence of family variables on women's relocation decisions than men's. Landau, et al. (1992) in their study of 1,648 randomly selected managerial and professional employees of a large, multi-division, multi-location U.S. corporation (24% women) found that men were more willing to relocate for career enhancement than were women. In addition, other factors related to willingness to relocate were important, such as having fewer children, not having elderly relatives in the area, and perceiving that spouse's career was less important than their own career. Importance of spouse's career interacted with gender, being a stronger predictor for women than for men. Shauman and Xie (1996) examined data from the 1990 census restricting their analyses to scientists only (those holding a Ph.D. in one of 5 major science disciplines, and currently holding a science-related job). They found that female scientists with no kids are more likely to move than male scientists with no kids, but that male scientists with children age 0 to 6 and from 7 to 12 were more likely to move than female scientists with children in these age ranges. Having a younger spouse was positively related to mobility, but men were more likely to have a younger spouse and women were more likely to have an older spouse, resulting in a net effect of greater mobility for men than women.

Finally, Valcour and Tolbert (2003), in their analysis of the Cornell Couples and Careers study of dual-career couples collected in 1998 (967 men and 923 women from seven large U.S. employers headquartered in upstate New York), distinguished between intra-organizational mobility – moving within the same organization, which was deemed a traditional career pattern – vs. inter-organizational mobility – moving between organizations or changing employers. Men had higher intra-organizational mobility than women, who, in turn, had higher inter-organizational mobility than men. Number of children was positively related to intra-

organizational mobility for men and negatively related to intra-organizational mobility for women. Men's perception that their career took priority over their spouse/partner's was also positively related to their intra-organizational mobility. There was no relationship between these variables for women. Factors that predicted inter-organizational mobility suggested such moves were not always career enhancing and may reflect being a "trailing spouse" more so than intra-organizational mobility. For example, for men, occupational prestige and career priority were negatively related and number of marriages was positively related to inter-organizational mobility. For women, number of children was positively related to inter-organizational mobility.

To summarize, these studies reinforce my original argument that women's relocation decisions tend to be more sensitive to gender and family-role ideologies than are men's. It can be argued, however, that senior staff and upper-level managers at Costco are more typical of ambitious, career-oriented women and thus may be less sensitive to traditional family roles than are average working women. However, the studies by Landau et al. (1992) and Shauman and Xie (1996), reveal that even among individuals with strong career orientations (managers, professionals and scientists), decisions to relocate among women in these studies were more sensitive to family and spousal factors than they were among men. Moreover, data provided by Dr. Saad contradict Dr. Reskin's speculation that Costco senior staff managers (or AGMs and GMs) are less likely to have young children that would affect their relocation or other job-attribute decisions. Dr. Saad demonstrated that Costco female senior staff managers (as well as female AGMs and GMs) are *more likely* than women in comparable positions and industries to be married and have children under age 18 (Saad rebuttal report pp 50-51 and exhibit R42).

Abundant, current research confirms that managerial and professional women continue to have different job attribute preferences from their male counterparts on various dimensions that may affect their desire for jobs like Merchandise Manager that require difficult working hours and potential relocation; that family structure variables affect some but not all of these preferences for women more than men; and that female managers at Costco are more likely than

similarly situated female managers elsewhere in the U.S. labor force to have strong family demands.

VI. Conclusion

Although stereotyping and cognitive bias are important concepts that may indeed explain problems that many women continue to face in the workplace, I maintain that they are not likely explanations for the alleged gender disparities in promotion to upper-level warehouse management positions at Costco. The statistical analyses performed by Dr. Drogin and refined by Dr. Saad show little to no reliable disparity in promotion rates to AGM and GM positions; male dominance and tokenism are not sufficient explanations for differences in percentages of women across the four senior-level staff management positions; and the scholarship challenging the stereotype-reducing effects of individuating information does not reliably apply to conditions at Costco. On the contrary, gender differences in preferences for job attributes relevant to senior staff positions at Costco persist in the 21st century among career-oriented managerial and professional women and men. The research connects such preferences to gender-role socialization, if not specifically to family constraints, neither of which can be attributed to structural constraints imposed by Costco. I maintain that it is very plausible that such preferences account for the relative paucity of women in merchandise manager positions, which is the key portal position to upper-level warehouse management at Costco.

I declare under penalty that the foregoing is true and correct, and that the remaining portions of this document consist of references cited in this report, the tables referred to therein, an exhibit of deposition references. Executed at Carbondale, Illinois, September 22, 2006.

Margaret S. Stockdale

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VIII. Tables

A. *Table 1: Means, standard deviations and zero-order correlations among study variables*

(DV=Ideal Working Hours), Managerial and Professional wage or salary earners for private, for-profit employers. NSCW data, 2002; n=478 (some r's are based on fewer respondents due to missing data)

			Correlations (r)											
Variable	Mean	SD	1	2	3	4	5	6	7	8	9	10	11	12
1. Ideal work hours	35.13	14.94												
2. Sex[1]	1.44	0.50	**-0.18**											
3. Egal 1[2]	2.88	1.05	**0.09**	0.12										
4. Egal 2[3]	3.03	1.02	0.08	**0.19**	**0.36**									
5. EGAL (scale)	2.96	0.86	**0.10**	**0.19**	**0.83**	**0.82**								
6. Marital status[4]	1.30	0.46	-0.04	0.09	**0.17**	**0.11**	**0.18**							
7. Age of youngest kid	3.01	1.22	-0.05	0.09	**0.20**	0.03	**0.14**	**0.33**						
8. Number kids	2.55	1.49	0.09	**-0.11**	-0.08	**-0.13**	**-0.13**	**-0.15**	0.04					
9. Culture[5]	3.11	0.68	0.05	0.02	0.09	**0.14**	**0.15**	0.04	0.04	0.02				
10. 2001 total fam income	2.00E+05	2.97E+06	0.01	0.04	0.04	0.04	0.05	-0.03	0.03	0.02	0.02			
11. Years in labor force	2.59	1.08	0.06	-0.04	-0.07	-0.01	-0.04	**0.19**	**0.23**	**0.20**	0.08	0.06		
12. Level of Education	4.07	1.44	-0.05	**0.14**	-0.03	-0.07	-0.06	0.01	0.05	0.10	0.01	0.02	0.04	
13. Family power[6]	70.59	27.53	**0.17**	**0.43**	-0.05	**-0.14**	**-0.12**	**0.32**	**0.17**	0.03	0.02	0.04	0.03	0.06

Note: Correlations in **Boldface** are statistically significant, p<.05 or smaller.
[1]1=male; 2=female
[2]Egal 1=Men should work and women should stay at home (1=strongly agree; 4=strongly disagree)
[3]Egal 2: Workings mom's can have just as good a relationship with their kids than nonworking moms (1=strongly disagree; 4=strongly agree); EGAL (scale) is the average of Egal 1 and Egal 2.
[4]1=spouse/partner in residence; 2=all other arrangements
[5]1=company's culture is not family friendly; 4=company's culture is family friendly
[6]Family power=Respondent's income as percent of household income

B. ***Table 2: Mediated regression results, predicting ideal working hours***

Variable	Beta (standardized)		
	Step 1	Step 2	Step 3
Step 1: Control Variables[11]			
Age	-0.08	-0.05	-0.03
Years in Labor Force	0.18	0.13	0.11
Level of Education	0.1	0.08	0.08
Step 2: Independent Variable			
Sex		-0.18***	-0.18***
Step 3: Mediators			
Egalitarian attitude			0.07
Family Power			0.03
Change in R^2	0.02	0.03*	0.01

[11] Note: a second analysis including personal pre-tax income from main job as a control variable was conducted (n=209 – reduced due to missing data). Income was significantly related to ideal hours (standardized beta = .18, p<.05), as well as to gender (r=-.33, p<.001), but sex remained a significant predictor of ideal hours after income was controlled (beta=-.15, p<.05), and after the proposed mediators were accounted for (beta=-.17, p<.05).

C. *Table 3: Moderator analyses predicting ideal working hours by gender*

Variable	Beta (standardized) Step 1	Step 2
Moderator 1: Egalitarian attitude		
Sex	-0.21*	-0.21*
EGAL	0.10*	-0.27*
Sex*EGAL		0.39*
Moderator 2: Family power		
Sex	-0.19*	-0.19*
Family Power	0.03	0.40*
Sex*Family power		-0.39*
Moderator 3: Marital status		
Sex	-0.19*	-0.19*
Marital Status	0.01	0.04
Sex * Marital Status		-0.03
Moderator 4: Number of children		
Sex	-0.23*	-0.23*
Number of children	-0.08	-0.11
Sex*Number of children		0.02
Moderator 5: Age of youngest child		
Sex	-0.20*	-0.20*
Age of youngest child	0.11	0.00
Sex*Age of youngest child		0.11
Moderator 6: Pretax personal income		
Sex	-.08	-.09
Income	.07	.08
Sex*Income		-.01

*$p<.05$

IX. Exhibit A: Role of GM or AGM in promotion to AGM or senior staff manager: Summary of depositions (prepared by defense counsel).

Role of GM or AGM in promotion to AGM or senior staff manager

Wales = AGM (and potential plaintiff)

Davis, Cardoso = GMs, one in Northwest region, one in Texas region

Omoss = regional (district) VP, Texas region

Zook = EVP and corporate designee re promotion process

POINT	SOURCE(S)
GM as a primary decision-maker on whom to promote to GM	
GM a primary decision-maker on promotion to GM, with district regional manager also involved; no approval by senior regional VP	Zook 132
For GM selections there are three decision-makers: the GM who knows the candidate, the regional manager, and the senior regional VP	Zook 96-97
Regional manager Webb had Wales interview with Melody McCoy (GM in building with opening for AGM) once she was identified as AGM candidate. McCoy's input, and that of Wales' then GM, factored into promotion decision	Wales 10-11
Break down of Lynne Boddy promotion to GM slot in Fort Worth (performance evals, numbers, walk notes, special projects success). Group decision involving EVP, SVP, regional manager, and GM.	Omoss 76-77
GM/AGM as primary information source & GM as decision-maker on whom to promote to AGM	
GM sets goals for AGMs	Zook 89-90
Mario's GMs give him their own talent pools for their managers – each can use their own individualized format.	Omoss 249-250

POINT	SOURCE(S)
GM is person relied on "to identify those people they think would be good AGMs"	Zook 128
GM meets managers re career development	Davis 133
GM does perf eval on AGMs	Davis 152-153
GMs do promotable lists covering managers within the warehouse, which they share with regional managers	Davis 199, 201, Exs. 87, 88
GMs provide information to regional managers to identify people ready for promotion	Zook 138
Performance of prospective AGM is well known through exposure to local managers; the GM does a daily walk with merch, fresh, bakery, meat, deli, receiving, front end, AMEX	Davis 229-232
GMs talk about promotability of managers to the regional managers	Davis 237
Regionals in considering people for AGM get feedback from the GM and the AGMs	Webb 115
Wendy Davis, Wales' GM, would coach and train on the job to help managers develop and become promotable	Wales 110
GM is the one to recommend a Staff Manager for promotion to AGM	Wales 136
Members of the warehouse management team discuss their goals with GM	Wales 156
Melody McCoy (the GM with the opening) made the decision to promote Wales to AGM, with regional approval	Wales 160-161
Regular performance feedback toward promotion is given to all managers in regular weekly and monthly meetings	Cardoso 21
As GM, Cardoso still uses "Career Path" forms (these were used back in the day by Price	Cardoso 27-30

POINT	SOURCE(S)
Club) to chart careers of all of his managers. He does this in addition to the career planning and goal setting called for by the annual performance evaluation	
To fill AGM slots, he is constantly evaluating employees (with respect to experience and mobility). He captures this on a warehouse-level "talent list" that he prepares.	Cardoso 97-98
Promotion to AGM is a joint decision between VP and GMs, and there are interviews	Cardoso 98
As GM, he and his AGMs do warehouse-level talent/experience rankings of all Staff Mgrs	Cardoso 101
Fidel, GM, comprehensively discusses the individual measurements used to evaluate someone for inclusion on his warehouse-level talent list (the example employee used is Dan Iaquinta, an AGM candidate)	Cardoso 104-105
Fidel's warehouse-level talent list (prepared for the regional manager) covers three levels: Supervisors to salaried management; Junior Manager to Senior Staff; Senior Staff to AGM	Cardoso 103-110
As GM, Fidel walks the floor with all managers and management candidates to teach and "test the knowledge"	Cardoso 193
All managers are expected to develop people (see Perf Eval form), and the regional manager sets specific goals for GMs in that regard (Fidel's was to develop a Merch Mgr and an AGM). GMs are constantly developing people.	Cardoso 213-214
At the District-wide manager meetings (all GMs meet with VP monthly), they have roundtable discussions re. promotable candidates, and propose candidates to regional manager.	Cardoso 217-218

POINT	SOURCE(S)
Important to master various positions (here, talking about Horstman & Merch Mgr) under different GMs and regional managers because each has their own style -- this will make you stronger and more promotable	Cardoso 248-249
It is a regular focus of all GMs to "mentor" and guide subordinate managers. He does this through Career Paths and walks.	Cardoso 275-276
Comprehensive discussion of walk, talks to different people and visits various depts (walk could be 15 minutes to 4 hours, depending on issues presented)	Omoss 84-90
No need to post for AGM because he knows them very well from direct contact. And, he discusses managers daily, weekly, monthly with their GMs – ongoing teaching process	Omoss 124
In Texas Region, Mario receives talent pools from all his GMs (the list include Junior Mgrs & up), and they talk about the lists often.	Omoss 206-209
GMs and AGMs select and rotate senior staff, with little or no regional involvement	
GM helps in selecting senior staff at new location	Davis 87
Rotations among senior staff done by the GM	Davis 118, 278-79,
GM promotes to senior staff positions; GM is the one who decides whom to promote to a senior staff position	Davis 132-33; Zook 120-21
GMs and AGMs interview and select staff manager candidates	Davis 225
GM evaluation of Staff Manager. Example: GM debating product placement with Merch Manager (Wales)	Wales 22-23
GM gave training/coaching on merchandising the Costco way, and she made sure that her managers successfully moved through the	Wales 114-116

POINT	SOURCE(S)
various areas of the building toward promotion	
Individualized merchandising training program set-up for Wales (Center/seasonal) to prepare her for promotion – GM Davis very hands-on in that way	Wales 118-119
Rotation between Senior Staff posts decided by GM and AGMs based on employee Career Paths/goals, performance, experience	Cardoso 133-134
Omoss previously (through 2002) used a talent pool ranking form that covered financials, merch, ops, people, etc. (employee ranked in each area), but for his region now, he has decided to abandon that and rely on Perf Evals and his notes (walks). Why? This works better for him, and he believes that Rothman Perf Eval is good tool.	Omoss 228-229
Executive managers also gather promotional information on walks	
regional managers walk often, every three weeks, for 2-6 hours	Davis 233, 235
Senior regional VPS walk every two months	Davis 234
EVPS walk 2-3 times a year	Davis 235
During a walk, regional manager Webb discussed Merch Mgr Wales' potential promotion to AGMt	Wales 144
Local managers speak with Senior VP and regional manager at least once a month during walks and get specific feedback about their work	Wales 148
Omoss walks with AGMs and Staff every time he is in buildings. Keeps walk notes; GMs talk to him about people, and he in turn talks to his bosses (e.g. "that Merch Mgr was really on top of her game, knew numbers, etc.)	Omoss 124-125
GM as source of information regarding abilities & interests of managers re	

POINT	SOURCE(S)
promotion	
GM advised of career goals	Davis told her GM Eric 71, 80 of her interest in being a GM someday
GM does perf eval on AGMs	Davis 152-153
GM knows his or her people and would know who's interested in the next level re promotion	Zook 130
GM gives copy of perf evals of AGMs with regional managers	Davis 163
GMs and AGMs do perf evals on staff managers	Davis 169

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