# IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF MISSISSIPPI NORTHERN DIVISION

United States of America,	
Plaintiff,	) ) Civil Action No. ) 3:13-CV-978-HTW-LRA )
City of Meridian; County of Lauderdale; Judge Frank Coleman, in his official capacity; Judge Veldore Young, in her official capacity; State of Mississippi; Mississippi Department of Human Services; and Mississippi Division of Youth Services	
Defendants.	) ) ) )

# **Joint Motion for Entry of Settlement Agreement**

The City of Meridian and the United States of America (collectively, "the Parties") hereby jointly and respectfully request that this Court enter the attached Settlement Agreement ("Agreement") as an order of the Court. *See* Attachment 1. The Parties have been engaged in litigation and settlement negotiations for over two (2) years. The Agreement is reasonable and equitable, and reflects the Parties' mutual desire to protect the constitutional rights of Meridian youth while avoiding the burdens of contested litigation. The Agreement, if approved, will resolve all of the United States' claims against City of Meridian and its Police Department.

In support of this motion, the parties submit the accompanying Memorandum in Support of Joint Motion for Entry of Settlement Agreement.

Dated this 19th day of June, 2015.

# Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

I hereby certify that on June 19th, 2015, I electronically filed a copy of the foregoing Joint Motion for Entry of Settlement Agreement with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

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