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

United States of America,)
Plaintiff, v.)) 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 State of Mississippi 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 engaged in extensive arms-length settlement negotiations. The Agreement is reasonable and equitable, and reflects the Parties' mutual desire to protect the constitutional rights of Lauderdale County youth while avoiding the burdens of contested litigation. The Agreement, if approved, will resolve all of the United States' claims against the Mississippi Department of Human Services, Division of Youth Services.

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

Respectfully submitted this 19th day of June 2015.

For the Plaintiff THE UNITED STATES OF AMERICA:

GREGORY K. DAVIS United States Attorney Southern District of Mississippi VANITA GUPTA Principal Deputy Assistant Attorney General Civil Rights Division

MARK KAPPELHOFF

Acting Deputy Assistant Attorney General Civil Rights Division

JUDY C. PRESTON Acting Chief SHELLEY R. JACKSON (MA Bar No. 548997) Deputy Chief Special Litigation Section

/s/ Mitzi Dease Paige

MITZI DEASE PAIGE (Bar No. 6014) Assistant United States Attorney Chief, Civil Division Southern District of Mississippi 501 E. Court Street, Suite 4.430 Jackson, MS 39201 Phone: (601) 965-4480 Direct: (601) 973-2840 Facsimile: (601) 965-4409

E-mail: mitzi.paige@usdoj.gov

/s/ Rashida Ogletree

RASHIDA OGLETREE (DC Bar No. 974441) JACQUELINE CUNCANNAN (DC Bar No. 462985) RICHARD GOEMANN (DC Bar No. 405030) MICHELLE JONES (DC Bar No. 989343) Attorneys U.S. Department of Justice Civil Rights Division Special Litigation Section 950 Pennsylvania Avenue, NW Patrick Henry Building, 5th Floor Washington, DC 20530 Phone: (202)305-3712 Facsimile: (202) 514-6903 E-mail: rashida.ogletree@usdoj.gov

Counsel for the State of Mississippi:

/s/ Douglas T. Miracle

DOUGLAS T. MIRACLE (Bar No. 9648) Speical Assistant Attorney General Civil Litigation Division Office of the Attorney General 550 High Street, Suite 1100 Post Office Box 220 Jackson, MS 39205-0220 Phone: (601) 359-5654 Facsimile: (601) 359-2003 E-mail: dmira@ago.state.ms.us

CERTIFICATE OF SERVICE

I hereby certify that on June 19, 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:

Charles W. Wright, Jr. Charles W. Wright, Jr., PLLC 1208 22nd Avenue P.O. Box 1677 Meridian, MS 39302 Charlie_wright@comcast.net

Lee Thaggard Robert T. Bailey Barry, Thaggard, May & Bailey, LLP P.O. Box 2009 Meridian, MS 39302-2009 thaggard@BarryPalmerLaw.com

Ronnie L. Walton Reed C. Darsey Glover, Young, Walton & Simmons, PLLC P.O. Drawer 5514 Meridian, MS 39302-5514 ronnie@gloveryoung.com

Douglas T. Miracle Harold E. Pizzetta, III Office of the Attorney General Civil Litigation Division P.O. Box 220 Jackson, MS 39205-0220 dmira@ago.state.ms.us hpizz@ago.state.ms.us

> <u>/s/ Rashida Ogletree</u> RASHIDA OGLETREE (DC Bar No. 974441)