

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

LASHAWN A., <i>et al.</i> ,)	
)	
Plaintiffs,)	
))	Civil Action No.: 89-1754 (TFH)
v.)	
)	
VINCENT C. GRAY, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

CONSENT MOTION FOR ADOPTION OF ORDER REGARDING ATTORNEYS' FEES AND COSTS

The parties agree to the attached proposed Consent Order that addresses plaintiffs' claim for attorneys' fees and costs for work associated with litigating various motions and monitoring compliance from January 1, 2009 through March 31, 2010, related to the above-referenced civil action. This agreement is without prejudice to the claims raised relative to plaintiffs' civil contempt remedy submission and the responses thereto. Pursuant to the Court's Order of November 2, 2004, the strict application of Rule 23(h) of the Federal Rules of Civil Procedure does not require approval of notice, publication, and a hearing on the request for attorneys' fees and expenses in this matter.

Defendants, with the authorization of plaintiffs' counsel, respectfully submit the proposed Consent Order for the Court's consideration and move for its adoption by the Court.¹

Respectfully submitted,

IRVIN B. NATHAN
Attorney General for the District of Columbia

¹ The District of Columbia also wishes to inform the Court that Attorney General Nathan has decided not to pursue the District's appeal of the Implementation and Exit Plan ordered on December 17, 2010 and has moved to dismiss that appeal.

GEORGE C. VALENTINE
Deputy Attorney General
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**MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF
THE CONSENT MOTION FOR ADOPTION OF ORDER
REGARDING ATTORNEYS' FEES AND COSTS**

- 1. Inherent Power of the Court.
- 2. Consent of the parties.
- 3. The record herein.

Respectfully submitted,

IRVIN B. NATHAN
Attorney General for the District of Columbia

GEORGE C. VALENTINE
Deputy Attorney General
Civil Litigation Division

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