

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO.
)	
WELLS FARGO BANK, NA,)	
)	
Defendant.)	
_____)	

**JOINT MOTION FOR ENTRY OF
CONSENT ORDER AND STATEMENT OF POINTS AND AUTHORITIES**

Plaintiff, United States of America, and Defendant, Wells Fargo Bank, NA (“Wells Fargo”), pursuant to Rule 7 of the Federal Rules of Civil Procedure and Local Civil Rule 7, hereby move the Court for entry of the proposed Consent Order lodged contemporaneously with this motion to resolve the United States’ civil action brought to enforce the Equal Credit Opportunity Act (ECOA), 15 U.S.C. §§ 1691-1691f, and the Fair Housing Act (FHA), 42 U.S.C. §§ 3601-3619. The United States and Wells Fargo ask that the Consent Order be entered immediately.

In support of this motion, the parties state that the United States has filed a complaint with the Court alleging violations of ECOA and FHA. Wells Fargo, by agreeing to the Consent Order, is not admitting any of the allegations. Rather, the Consent Order is entered into by the parties for the purpose of resolving disputed claims under ECOA and FHA and avoiding the expenses and risks of further litigation. The parties submit that the proposed Consent Order is fair, adequate, reasonable, and in the public interest. *See Stewart v. Rubin*, 948 F. Supp. 1077, 1986 (D.D.C. 1996) (setting forth the standard for approval of settlements).

Wherefore, for the foregoing reasons, the Court should enter the proposed Consent Order, which is attached hereto per Local Civil Rule 7(c).

Dated: July 12, 2012

Respectfully submitted,

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