

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

United States of America,

Plaintiff,

v.

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.

Civil Action No.
3:13-CV-978-HTW-LRA

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:

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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:

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