

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA	:	CIVIL ACTION NO.
12-CV-01924		
VERSUS	:	SECTION E
		JUDGE SUSIE MORGAN
CITY OF NEW ORLEANS	:	DIVISION 2
		MAGISTRATE WILKINSON

**MOTION TO VACATE CONSENT DECREE PURSUANT TO RULE 60 OF THE
FEDERAL RULES OF CIVIL PROCEDURE**

The Defendant, the City of New Orleans (“City”), moves this Honorable Court for an order vacating the Consent Decree entered by the Court on January 11, 2013. Mayor Mitchell J. Landrieu began reforming the New Orleans Police Department (“NOPD”) when he took office in May 2010 and remains committed to implementing reforms to ensure that the NOPD is the best police department in the nation. The City, however, is compelled to file this Motion because, as fully set forth in the Memorandum filed herewith, the negotiations that led to the signing of the Consent Decree were tainted, any consent provided by the City was vitiated under Louisiana law, and there is a plethora of procedural deficiencies underlying the proceedings that led to the entry of the Consent Decree.

Respectf

ully submitted,

/s/

Sharonda R. Williams

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading has been served on all counsel of record through the Court's CM/ECF electronic filing system this 31st day of January, 2013.

/s/ Sharonda R. Williams

SHARONDA R. WILLIAMS

