

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Case No.
v.)	
)	Judge
THE STEUBENVILLE CITY BOARD)	
OF EDUCATION,)	Magistrate Judge
)	
Defendant.)	
_____)	

**JOINT MOTION FOR ENTRY OF CONSENT DECREE AND
TO SCHEDULE A FAIRNESS HEARING**

Plaintiff United States of America and Defendant the Steubenville City Board of Education respectfully move the Court to enter the accompanying proposed Order tentatively approving the proposed Consent Decree, attached as Exhibit 1 to that Order, subject to final approval and entry by the Court, and to schedule a fairness hearing for the purpose of considering any objections regarding the relief proposed to be awarded under the Consent Decree and to determine whether the Consent Decree may be finally entered.

The proposed Consent Decree, if given final approval and entered by this Court, will resolve all pending issues in this case.


A Memorandum in Support, Joint Stipulation of Facts, and a proposed Order tentatively approving and entering the Consent

// //
// //

Decree, subject to final approval and entry after the fairness hearing, accompany this Motion.


Respectfully submitted,

For the Defendant:



Drew H. Campbell
Bricker & Eckler
100 South Third Street
Columbus, Ohio 43215-4291

For the Plaintiff:



William B. Fenton
David Y. Chen
U.S. Department of Justice
P.O. Box 65968
Washington, D.C. 20035-5968
(202) 307-5769