

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

| | | |
|----------------------------------|---|---------------------------------|
| UNITED STATES OF AMERICA, |) | NO. 4:16-cv-000180-CDP |
| |) | |
| Plaintiff, |) | JUDGE CATHERINE D. PERRY |
| |) | |
| v. |) | |
| |) | |
| THE CITY OF FERGUSON, |) | |
| |) | |
| Defendant. |) | |
| |) | |
| _____ |) | |

JOINT MOTION FOR ENTRY OF CONSENT DECREE

Plaintiff, the United States of America, and Defendant, the City of Ferguson (collectively, “the Parties”), have entered into the Consent Decree (“Decree”) attached as Exhibit A, and jointly move for approval and entry of the Decree as an Order of this Court. As set forth in Paragraph 458 of the Decree, the Parties respectfully request that the Court retain jurisdiction over the Decree for the purpose of enforcing its terms until Defendant has achieved full and effective compliance with the Decree and maintained such compliance for no less than two consecutive years.

A memorandum in support of this Motion is attached.

Respectfully submitted this 17th day of March, 2016.

For the UNITED STATES OF AMERICA:

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