

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION

SCOTT M. CRAWFORD, <i>et. al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
and	)	Civil Action No. 3:08-cv-586-TSL-FKB
	)	
THE UNITED STATES OF AMERICA,	)	HON. TOM S. LEE
	)	United States Senior District Judge
Plaintiff-Intervenor,	)	
	)	
v.	)	HON. F. KEITH BALL
	)	Magistrate Judge
CITY OF JACKSON AND	)	
CITY OF JACKSON PUBLIC	)	
TRANSPORTATION SYSTEM	)	
("JATRAM")	)	
	)	
Defendants.	)	
_____	)	

**JOINT MOTION TO EXTEND AND REVISE CONSENT DECREE**

On March 30, 2010, this Court entered a Consent Decree to resolve this case. Paragraph 84 states that the Order shall remain in effect for five years from that effective date, until March 30, 2015.

The City of Jackson has made improvements in its provision of accessible public transportation services ("JATRAM"). However, the parties are in agreement that the City of Jackson has not reached full compliance with the Consent Decree, and an 18 month extension is warranted to allow for additional time to meet all of the terms of the Decree, until September 30, 2016.

The parties agree the City needs additional time to comply with the following requirements of the Consent Decree:

1. Maintaining the accessibility features on all vehicles in operative condition (e.g., wheelchair lifts/ramps). Consent Decree ¶¶ 19-20.
2. Conducting daily operational checks of wheelchair lifts/ramps each morning, which includes cycling the lifts and record the results. Consent Decree ¶ 20(B)-(C).
3. Removing buses with inoperable lifts/ramps from service at the beginning of the service day or when discovered to be inoperable, or within three days if there is no replacement bus available and removing the bus from service would substantially delay or disrupt the bus service schedule. Consent Decree ¶ 20(E)-(F).
4. Performing preventative maintenance on the accessibility features of its buses in accordance with, at a minimum, the manufacturer's recommendations. Consent Decree ¶¶ 22-23.
5. Establishing an ADA Coordinator in the Department of Planning and Development, who reports to the Director, and who is responsible for carrying out day-to-day compliance of JATTRAN with title II of the ADA. Consent Decree ¶¶ 45-49.
6. Maintaining and reporting certain data and records, including each lift/ramp malfunction and subsequent servicing, lift/ramp preventative maintenance, and paratransit telephone access. Maintain certain data for compliance assessment by the Auditor and the United States. Consent Decree ¶ 66.

To facilitate reporting by the City and monitoring by the United States going forward, the City agrees to submit the data in Paragraph 66 on a monthly basis for the remainder of the

Decree. The City will also continue to submit written report provided every six months, as outlined in Paragraph 68.

Paragraph 84 will be amended to state that the Consent Decree will expire on September 30, 2016, unless the interests of justice require further extension.

Accordingly,

IT IS SO ORDERED.

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Tom S. Lee  
United States Senior District Judge

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Date

AGREED AND CONSENTED TO BY:

FOR THE UNITED STATES:

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Attorney General of the United States

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March 10, 2015  
Date

FOR THE PRIVATE PLAINTIFFS:

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March 10, 2015  
Date

FOR THE CITY OF JACKSON:

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March 10, 2015  
Date