

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

UNITED STATES OF AMERICA,)	Civil Action No.
)	
Plaintiff,)	2:11-ev-02484-HGB-JCW
)	
VERSUS)	Section "C" (2)
)	
TERREBONNE PARISH, LOUISIANA)	JOINT MOTION FOR
)	ORDER OF FINAL
Defendant.)	DISMISSAL
)	
)	
)	
)	
)	

PLAINTIFF, THE UNITED STATES OF AMERICA, and DEFENDANT, TERREBONNE PARISH, LOUISIANA, by their undersigned attorneys, jointly move the Court to dismiss this case with prejudice, terminating the Revised Settlement Agreement and Order (Agreement) entered in this case on October 31, 2011. Pursuant to the terms of Paragraph 85 of the Agreement, the Agreement shall terminate in its entirety when the United States certifies that the Defendant has maintained substantial compliance with all provisions of the Agreement for twelve (12) consecutive months. The United States hereby certifies that the Defendant has achieved substantial compliance with all provisions of the Agreement for the requisite time period. Accordingly, dismissal is warranted.

WHEREFORE, the Parties move the Court to enter the attached proposed Order of Final Dismissal terminating the Agreement and dismissing this case with prejudice.

DATED this 19th day of November, 2014.

Respectfully submitted,

FOR THE UNITED STATES:

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CERTIFICATE OF SERVICE

I hereby certify that on November 19, 2014, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to counsel of record who are participants. I further certify that I forwarded the foregoing document via fax and/or first class mail to all non-CM/ECF participants.

s/ Joshua C. Delaney

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