UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

	UNITED	STATES	OF AMERICA,
--	--------	--------	-------------

Plaintiff,

CASE NO.: 1:18CV194

and

HOUSING OPPORTUNTIES MADE EQUAL, INC.

Plaintiff-Intervenor,

v.

JOHN KLOSTERMAN and SUSAN KLOSTERMAN,

Defendants.

JOINT MOTION TO APPROVE AND ENTER CONSENT ORDER

Plaintiff United States of America, Plaintiff-Intervenor Housing Opportunities Made Equal, Inc. ("HOME"), and Defendants John Klosterman and Susan Klosterman jointly move the Court to approve the attached Consent Order resolving this litigation and to enter the Consent Order as a Judgment of the Court. The attached agreement resolves all claims by the United States that were asserted in its Complaint (ECF No. 1) and all claims by HOME that were asserted in its Complaint in Intervention (ECF No. 19) against Defendants in this action.

(Signatures on following page)

Dated: September 30, 2020

Respectfully submitted,

FOR PLAINTIFF UNITED STATES OF AMERICA:

DAVID DEVILLERS United States Attorney Southern District of Ohio

/s Matthew J. Horwitz
MATTHEW J. HORWITZ
(0082381)
Assistant U.S. Attorney
United States Attorney's Office
Southern District of Ohio
221 East Fourth Street, Suite 400
Cincinnati, Ohio 45205
Tel: (513) 684-3711
Matthew.Horwitz@usdoj.gov

ERIC S. DREIBAND Assistant Attorney General Civil Rights Division

/s/ Amie S. Murphy
SAMEENA SHINA MAJEED
Chief
TIMOTHY MORAN
Deputy Chief
KATHARINE F. TOWT
AMIE S. MURPHY
Trial Attorneys
Housing and Civil Enforcement Section
Civil Rights Division
U.S. Department of Justice
950 Pennsylvania Avenue NW

Washington, DC 20530 Phone: (202) 353-1285 Fax: (202) 514-1116

E-mail: Amie.Murphy@usdoj.gov

FOR DEFENDANTS JOHN AND SUSAN KLOSTERMAN:

/s/ Trent M. Thacker

Bruce A. Curry (0052401)
Lisa C. Haase (0063403)
Trent M. Thacker (0092058)
Curry, Roby & Mulvey Co., LLC
30 Northwoods Blvd., Suite 300
Columbus, Ohio 43235
Telephone: (614) 982-0321
Fax: (614) 430-8890
bcurry@crmlaws.com
lhaase@crmlaws.com
tthacker@crmlaws.com

Attorneys for Defendants John Klosterman and Susan Klosterman

FOR PLAINTIFF-INTERVENOR HOUSING OPPORTUNITIES MADE EQUAL, INC.:

/s/ Rebecca P. Salley_

Jennifer L. Branch (0038893) Rebecca P. Salley (0097269) Gerhardstein & Branch Co. LPA 441 Vine Street, Suite 3400 Cincinnati, Ohio 45202 Tel (513) 621-9100 Fax (513) 345-5543 jbranch@gbfirm.com rsalley@gbfirm.com