

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

UNITED STATES OF AMERICA,	)	Civil Action No. 2:24-cv-2029
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
PATRIOT BANK,	)	
	)	
Defendant.	)	
	)	

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**JOINT MOTION FOR APPROVAL AND ENTRY OF PROPOSED  
CONSENT ORDER AND MEMORANDUM IN SUPPORT**

Plaintiff United States of America and Defendant Patriot Bank (the “Parties”) have agreed upon and jointly move this Court to approve and enter the attached Consent Order as the judgment of the Court. The Parties hereby agree and stipulate to the Court’s entry of this Consent Order in resolution of this litigation. In support of their joint motion, the Parties state as follows:

1. The United States of America filed a Complaint alleging that Patriot Bank engaged in a pattern or practice of unlawful redlining in violation of the Fair Housing Act, 42 U.S.C. §§ 3601–3619, and the Equal Credit Opportunity Act, 15 U.S.C. §§ 1691–1691f, by discriminating on the basis of race, color, and national origin. Patriot Bank denies all allegations of redlining and of all unlawful conduct in the Complaint except that, for the purposes of this Consent Order, the Bank admits facts necessary to establish this Court’s jurisdiction over it and over the subject matter of this action.

2. The Parties have resolved the claims alleged in the Complaint and seek entry of the proposed Consent Order attached hereto as Exhibit 1.

3. The Court has jurisdiction over the Parties and subject matter of this action. There have been no factual findings or adjudication in this case.

4. The Parties agreed to the terms in the proposed Consent Order (Exhibit 1) to voluntarily resolve all claims arising from the conduct alleged in the Complaint.

5. Entry of this Consent Order is in the public interest.

6. In reaching this resolution and joint motion, the Parties have engaged in numerous discussions, including in person, by telephone, and via email, including as recently as January 2, 2024 to confirm the undersigned's assent in filing this joint motion for relief. Undersigned counsel for both Parties confirm they are in agreement as to the relief sought herein.

7. Accordingly, the Parties respectfully request that this Court approve and enter the proposed Consent Order.

Respectfully submitted,

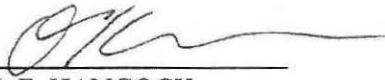
Dated: January 17, 2024

**For the United States of America:**

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