

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Cause No. 1:24-cv-
	)	
HENDRICKS COUNTY, INDIANA,	)	
	)	
Defendant.	)	

**PARTIES’ JOINT MOTION TO ENTER CONSENT DECREE**

Plaintiff, the United States of America (“United States”), through the undersigned attorneys, and Defendant, Hendricks County, Indiana, through the undersigned attorney, hereby move for entry of the Consent Decree between the United States and Hendricks County, Indiana. The proposed Consent Decree, attached hereto as Exhibit 1, will resolve Plaintiff’s claims against the Defendant and conclude the action.

[intentionally left blank]

Accordingly, the parties respectfully request that the Court grant this motion and approve, sign, and enter the proposed Consent Decree as a final judgment in this case.

Respectfully submitted,

/s/ Josh. J. Minkler

Josh J. Minkler  
Counsel for Hendricks County  
Barnes & Thornburg LLP  
11 S. Meridian St.  
Indianapolis, IN 46204  
Phone: (317) 231-6446  
[Josh.Minkler@btlaw.com](mailto:Josh.Minkler@btlaw.com)

9.18.24

Date

KRISTEN CLARKE  
Assistant Attorney General  
Civil Rights Division

CARRIE PAGNUCCO  
Chief

By:

/s/ Noah Sacks

Noah Sacks  
Jennifer E. McAllister  
Trial Attorneys  
Housing and Civil Enforcement Section  
Civil Rights Division  
U.S. Department of Justice  
150 M Street NE  
Washington, D.C. 20530  
Phone: (202) 532-5170  
[Noah.Sacks@usdoj.gov](mailto:Noah.Sacks@usdoj.gov)  
[Jennifer.McAllister@usdoj.gov](mailto:Jennifer.McAllister@usdoj.gov)

ZACHARY A. MYERS  
United States Attorney

By:

/s/ Jeffrey D. Preston

Jeffrey D. Preston  
Joi Kamper  
Assistant U.S. Attorneys  
U.S. Attorney's Office  
Southern District of Indiana  
10 West Market Street, Suite 2100  
Indianapolis, IN 46204  
Phone: (317) 226-6333  
[Jeffrey.Preston@usdoj.gov](mailto:Jeffrey.Preston@usdoj.gov)  
[Joi.Kamper@usdoj.gov](mailto:Joi.Kamper@usdoj.gov)

9.18.24

Date

**CERTIFICATE OF SERVICE**

I hereby certify that on September 18, 2024, a copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system. Notice of this filing was also sent by Certified U.S. Mail, postage prepaid and properly addressed, to the following:

Josh J. Minkler  
Barnes & Thornburg LLP  
11 S Meridian St.  
Indianapolis, IN 46204

/s/ Jeffrey D. Preston  
Jeffrey D. Preston  
Assistant United States Attorney  
Office of the United States Attorney  
10 W. Market St., Suite 2100  
Indianapolis, Indiana 46204-3048  
Telephone: (317) 226-6333