UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

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Plaintiff;

Civil Action No. ____

v.

POLICE DEPARTMENT OF BALTIMORE CITY, et. al.,

Defendants.

JOINT MOTION FOR ENTRY OF CONSENT DECREE

Plaintiff, the United States of America and Defendants, the Baltimore City Police

Department and the City of Baltimore, (collectively "the Parties"), have agreed upon and jointly
move the Court to approve and enter the attached Consent Decree as an Order of this Court. The
Consent Decree would resolve litigation initiated by the United States with the concurrent filing
of a Complaint pursuant to the Violent Crime Control and Law Enforcement Act of 1994, 42

U.S.C. § 14141, Title VI of the 1964 Civil Rights Act, 42 U.S.C. § 2000d, and the Omnibus
Crime Control and Safe Streets Act of 1968, 42 U.S.C. § 3789d and Title II of the Americans
with Disabilities Act of 1990, 42 U.S.C. §§ 12131–12134. The Parties further move that the
Court solicit written submissions about the proposed Consent Decree, and hold a public hearing
on the finalized proposed Consent Decree.

Respectfully Submitted,

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s/ Seth Wayne

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CERTIFICATE OF SERVICE

I certify that the foregoing Joint Motion for Entry of Consent Decree was served through the electronic filing service on January 12, 2017, to give notice to all registered parties.

s/ Seth Wayne
SETH WAYNE
Attorney for the United States