

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
– and –)	Civil Action No.: 2:12-cv-00217 (NGR)
)	
)	
CORPUS CHRISTI POLICE OFFICERS’)	Hon. Nelva Gonzales Ramos
ASSOCIATION,)	
)	
Plaintiff-Intervenor,)	
)	
v.)	
)	
CITY OF CORPUS CHRISTI, TEXAS,)	
)	
Defendant.)	

JOINT MOTION FOR FINAL ENTRY OF SECOND AMENDED CONSENT DECREE

Plaintiff United States of America (“United States”), Defendant City of Corpus Christi, Texas (“Corpus Christi” or the “City”), and Plaintiff-Intervenor Corpus Christi Police Officers’ Association (“CCPOA”) (collectively, the “Parties”) jointly move the Court for final entry of the Second Amended Consent Decree (“Decree”) that is attached as Exhibit 1, an earlier version of which the Court provisionally entered on September 19, 2012, *see* Dkt. #15. The Decree reflects the settlement agreement reached by the Parties, which was summarized on the record during the May 3, 2013 status conference. A proposed Order is being filed along with this motion.

The Decree, if entered in its entirety as a final order, would resolve the United States’ allegations that Corpus Christi engaged in a pattern or practice of sex discrimination against women in violation of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e, *et seq.* The Decree’s entry would also resolve the issues raised in CCPOA’s complaint-

in-intervention against the City and CCPOA's objections to the provisionally entered version of the Decree.

If the Decree is entered as a final order, the United States and the City will notify potential claimants (as the Decree defines the term) about how to apply for individual relief under the Decree. After that, the United States and the City will make initial determinations regarding what relief individual claimants are eligible to receive. Subsequently, the United States and the City will move the Court to schedule a fairness hearing on individual relief, so that the Court may consider claimants' objections to the United States and the City's relief recommendations. Before the hearing, the United States and the City will advise potential claimants about the relief recommendations, afford them the opportunity to object to those determinations, and apprise them about when and where the hearing will occur. *See generally* Decree, ¶¶ 44-50.

As set forth in the memoranda of law previously filed in support of the United States and the City's prior motions related to entering the Decree, Dkt. #14 and Dkt. #20, the Decree is lawful, reasonable, and equitable. Further, there are no outstanding objections to the Decree. Thus, the Court may enter the Decree immediately.

Accordingly, the Parties respectfully request that the Court grant this motion.

Date: May 15, 2013

Respectfully submitted,

FOR PLAINTIFF UNITED STATES OF AMERICA:

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CERTIFICATE OF SERVICE

I hereby certify that, on May 15, 2013, I electronically filed the foregoing document(s), including all attachment(s) and/or exhibit(s) thereto, with the Clerk of the Court using the CM/ECF system, which will then send a notification of electronic filing to Alison Logan, Esq., City of Corpus Christi, Texas.

Also on May 15, 2013, I caused to be sent, via electronic mail, a copy of the foregoing documents to the following counsel for Plaintiff-Intervenor Corpus Christi Police Officers' Association:

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