

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOHN DOE I, et al.,)	
)	
Plaintiffs,)	
)	
v.)	
)	
THE SCHOOL DISTRICT OF THE)	
CITY OF ALLENTOWN)	
(a/k/a “Allentown School District”), et al.)	
)	
Defendants.)	

Civil Action No.: 2:06-CV-1926 (JD)

UNITED STATES OF AMERICA,)	
)	
Plaintiff-Intervenor,)	
)	
v.)	
)	
THE SCHOOL DISTRICT OF THE)	
CITY OF ALLENTOWN)	
(a/k/a “Allentown School District”))	
)	
Defendant.)	

JOINT MOTION FOR APPROVAL AND ENTRY OF CONSENT DECREE

The United States of America and Defendant Allentown School District (herein “parties”) now move the court for approval and entry of the Consent Decree, attached hereto as Exhibit 1, for the reasons stated below.

The attached Consent Decree addresses and resolves the issues raised in the United States’ Complaint-in-Intervention. In addition, the parties agree that the Consent Decree is in the public interest and is fair, just and reasonable under the circumstances. Furthermore, the parties agree that each party shall bear its own costs, attorneys’ fees, and other expenses incurred in this

action.

WHEREFORE, the parties jointly, by and through their undersigned attorneys, hereby respectfully request that this Court approve and enter the attached Consent Decree and retain jurisdiction over this action during the term of the Consent Decree.

Respectfully submitted,

FOR PLAINTIFF-INTERVENOR UNITED STATES OF AMERICA:

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CERTIFICATE OF SERVICE

I hereby certify that on this, the 30th of July, 2012, I electronically filed the United States' and Allentown School District's Joint Motion for Approval and Entry of Consent Decree with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

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