

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

CITY OF NEW ORLEANS,

Defendant.

**CIVIL ACTION NO.
2:12-CV-01924**

**SECTION E
JUDGE SUSIE MORGAN
DIVISION 2
MAG. DONNA PHILLIPS CURRAULT**

PARTIES' JOINT MOTION FOR APPROVAL OF SUSTAINMENT PLAN

Plaintiff United States of America and Defendant City of New Orleans, including the New Orleans Police Department (NOPD), jointly move this honorable Court to approve the City's entry into the "Sustainment Period"¹ according to the terms in the attached Sustainment Plan.

The Parties agree that NOPD and the City have achieved compliance sufficient to enter the Sustainment Period set forth in Consent Decree Paragraph 491. It is acknowledged that NOPD and the City require additional time to satisfy some specific elements of the Consent Decree. The Parties agree that certain ongoing corrective actions and remedial measures have not been fully implemented or have not been in place long enough for the United States and the Monitor to fully evaluate implementation, effectiveness, sustainability, and durability. The Parties further agree that, by completion of the Sustainment Plan, the City will address any current outstanding issues of material compliance with the Consent Decree as set forth in the Sustainment Plan to demonstrate full and effective compliance as required by Consent Decree Paragraph 491. The City and NOPD acknowledge that they shall continue to comply with all provisions of the Consent Decree during

¹ The term "Sustainment Period," as used herein, refers to the two-year period measured from the Effective Date of the Sustainment Plan. *See* Sustainment Plan paragraph I(B)(4).

the Sustainment Period. The Parties acknowledge that the Sustainment Plan does not alter the roles, responsibilities, or authority set forth in the Consent Decree.

Under the terms of the Sustainment Plan, the Court's approval would begin the two-year Sustainment Period.² According to the Sustainment Plan, the Sustainment Period will be subject to tolling, if necessary.

Respectfully submitted this 27th day of September 2024.

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² On the issuance on the Court's Order granting the Sustainment Plan, the City's pending Motion to Terminate will be rendered moot. (Rec. Doc. 629).

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of September 2024, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

/s/ Jonas Geissler

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