

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	<b>NO. 4:16-cv-000180-CDP</b>
	)	
<b>Plaintiff,</b>	)	<b>JUDGE CATHERINE D. PERRY</b>
	)	
v.	)	
	)	
<b>THE CITY OF FERGUSON,</b>	)	
	)	
<b>Defendant.</b>	)	
	)	
_____	)	

**JOINT MOTION FOR ENTRY OF CONSENT DECREE**

Plaintiff, the United States of America, and Defendant, the City of Ferguson (collectively, “the Parties”), have entered into the Consent Decree (“Decree”) attached as Exhibit A, and jointly move for approval and entry of the Decree as an Order of this Court. As set forth in Paragraph 458 of the Decree, the Parties respectfully request that the Court retain jurisdiction over the Decree for the purpose of enforcing its terms until Defendant has achieved full and effective compliance with the Decree and maintained such compliance for no less than two consecutive years.

A memorandum in support of this Motion is attached.

Respectfully submitted this 17th day of March, 2016.

For the UNITED STATES OF AMERICA:

VANITA GUPTA  
Principal Deputy Assistant Attorney General  
Civil Rights Division

STEVEN H. ROSENBAUM  
Chief, Special Litigation Section

/s/ Christy E. Lopez  
CHRISTY E. LOPEZ  
Deputy Chief, Special Litigation Section  
601 D Street NW  
Washington, DC 20004  
(202) 514-2000  
DC Bar Number 473612

/s/ Jude J. Volek  
JUDE J. VOLEK  
Special Counsel, Special Litigation Section  
601 D Street NW  
Washington, DC 20004  
(202) 353-1077  
Permanent Bar Number 10041483N  
NY Bar Reg. Number 10041483

CHARLES HART  
AMY SENIER  
Trial Attorneys, Special Litigation Section

CHIRAAG BAINS  
Senior Counsel, Civil Rights Division

For the CITY OF FERGUSON:

/s/ Dan K. Webb  
DAN K. WEBB (Registration # 2954087IL)  
JARED L. HASTEN (Registration # 6296695IL)  
Winston & Strawn LLP  
35 West Wacker Drive  
Chicago, Illinois 60601  
(312) 558-5600

*Pro Hac Vice Admission Pending*

KEVIN M. O'KEEFE  
Curtis, Heinz, Garrett & O'Keefe  
130 South Bemiston  
Suite 200  
Clayton, Missouri 63105

*Counsel for The City of Ferguson*