

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA

JANE DOE, et al., )  
)  
Plaintiffs, )

and )

UNITED STATES OF AMERICA, )  
)  
Plaintiff-Intervenor )

v. ) NO. 11-cv-01999-JNE-SER

ANOKA-HENNEPIN SCHOOL )  
DISTRICT NO. 11, et al., )  
)  
Defendant. )

and )

E.R., by her next friend and parent, ) NO. 11-cv-02282-JNE-SER  
Quana Hollie; )  
)  
Plaintiff, )

and )

UNITED STATES OF AMERICA, )  
)  
Plaintiff-Intervenor )

vs. )

ANOKA-HENNEPIN SCHOOL )  
DISTRICT NO. 11, et al., )  
)  
Defendants. )

**JOINT MOTION TO APPROVE PROPOSED CONSENT DECREE**

Plaintiffs JANE DOE, *et al.*, and E.R., Defendants, the Anoka-Hennepin School District, its School Board, and certain officials named in the complaints, and the United States of America (“United States”), applicant for intervention, by their attorneys, jointly move the Court for an order approving the proposed consent decree filed concurrently with this Motion. The Motion is based upon the supporting memoranda of law, the entire file, and proceedings herein.

Respectfully submitted,

(Signature Pages to Follow)

Dated: March 5, 2012

**FOR THE UNITED STATES OF AMERICA:**

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Dated: March 5, 2012

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