

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA,

Plaintiff;

v.

POLICE DEPARTMENT OF BALTIMORE  
CITY, et. al.,

Defendants.

Civil Action No. \_\_\_\_

**JOINT MOTION FOR ENTRY OF CONSENT DECREE**

Plaintiff, the United States of America and Defendants, the Baltimore City Police Department and the City of Baltimore, (collectively “the Parties”), have agreed upon and jointly move the Court to approve and enter the attached Consent Decree as an Order of this Court. The Consent Decree would resolve litigation initiated by the United States with the concurrent filing of a Complaint pursuant to the Violent Crime Control and Law Enforcement Act of 1994, 42 U.S.C. § 14141, Title VI of the 1964 Civil Rights Act, 42 U.S.C. § 2000d, and the Omnibus Crime Control and Safe Streets Act of 1968, 42 U.S.C. § 3789d and Title II of the Americans with Disabilities Act of 1990, 42 U.S.C. §§ 12131–12134. The Parties further move that the Court solicit written submissions about the proposed Consent Decree, and hold a public hearing on the finalized proposed Consent Decree.

Respectfully Submitted,

VANITA GUPTA  
Principal Deputy Assistant Attorney General  
Civil Rights Division

STEVEN H. ROSENBAUM  
Chief  
Special Litigation Section

*s/ Seth Wayne*  
TIMOTHY D. MYGATT  
Deputy Chief  
MICHAEL J. SONGER  
PUNEET CHEEMA  
MAUREEN JOHNSTON  
SETH WAYNE  
Attorneys  
United States Department of Justice  
Civil Rights Division  
Special Litigation Section  
950 Pennsylvania Ave NW  
Washington, DC 20530

Attorneys for the United States

*/s/ David E. Ralph*  
DAVID E. RALPH (23500)  
Acting City Solicitor

SUZANNE SANGREE (26130)  
Chief Solicitor  
BALTIMORE CITY DEPARTMENT OF LAW  
100 North Holliday Street  
Baltimore, Maryland 21202  
Telephone: 410-396-3659  
Attorneys for Defendants Mayor and City Council of Baltimore,  
and the Police Department of Baltimore City

**CERTIFICATE OF SERVICE**

I certify that the foregoing Joint Motion for Entry of Consent Decree was served through the electronic filing service on January 12, 2017, to give notice to all registered parties.

s/ Seth Wayne  
SETH WAYNE  
Attorney for the United States