

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

UNITED STATES OF AMERICA,)	NO. 4:16-cv-000180-CDP
)	
Plaintiff,)	JUDGE CATHERINE D. PERRY
)	
v.)	
)	
THE CITY OF FERGUSON,)	
)	
Defendant.)	
)	
)	
<hr style="width:40%; margin-left:0;"/>)	

**JOINT MOTION FOR APPROVAL OF CONSENT DECREE MONITOR SELECTION
AND FOR A STATUS HEARING**

Plaintiff, the United States of America, and Defendant, the City of Ferguson (collectively, “the Parties”), have jointly selected the Squire Patton Boggs monitoring team, led by Clark Ervin, to serve as Monitor of the Consent Decree (“Decree”) [Docket No. 41]. Consistent with Paragraph 419 of the Decree, the Parties respectfully move the Court to approve the Parties’ selection.

The Parties also respectfully move the Court to set a status hearing for September 7, 2016 at 1:00 P.M. to provide the Parties and the Monitor with an opportunity to update the Court on the status of implementation of the Consent Decree.

A memorandum in support of this Motion is attached.

Respectfully submitted this 20th day of July, 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 Volek
JUDE 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 (# 2954087IL)
JARED L. HASTEN (#6296695IL)
Winston & Strawn LLP
35 West Wacker Drive
Chicago, Illinois 60601
(312) 558-5600

KEVIN M. O'KEEFE
Curtis, Heinz, Garrett & O'Keefe
130 South Bemiston
Suite 200
Clayton, Missouri 63015