

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**ROBERT SHREVE, et al.,**

*Plaintiffs,*

**UNITED STATES OF AMERICA,**

*Plaintiff-Intervenor,*

**V.**

**FRANKLIN COUNTY, OHIO, et. al.,**

*Defendants.*

Case No. 2:10-cv-644

Judge: Sargus

Magistrate Judge: Abel

## **JOINT MOTION FOR ENTRY OF SETTLEMENT AGREEMENT**

Plaintiff-Intervenor the United States and the Sheriff of Franklin County, et al.,

Defendants, having entered into the attached Settlement Agreement, jointly move this Court for entry of an Order conditionally dismissing the United States' Complaint, pursuant to Fed. R. Civ. P. 41(a)(2), conditioned upon Defendants achieving substantial compliance with the terms of the Settlement Agreement. The parties respectfully request that the Court place the case, upon resolution of outstanding issues as to Plaintiffs' claims, on its inactive docket while retaining jurisdiction, for the sole purpose of enforcing the Settlement Agreement in the event of a compliance dispute, until a final dismissal with prejudice is entered.

Respectfully submitted:

FOR THE UNITED STATES:

JONATHAN M. SMITH  
Chief  
Special Litigation Section

TAMMIE M. GREGG  
Principal Deputy Chief  
Special Litigation Section

/s/ Aaron Fleisher  
AARON FLEISHER  
ANIKA GZIFA  
MARLYSHA MYRTHIL  
SERGIO PEREZ  
KERRY KRENTLER DEAN  
Trial Attorneys  
U.S. Department of Justice  
Civil Rights Division  
Special Litigation Section  
950 Pennsylvania Avenue, N.W.  
Washington, D.C. 20530  
(202) 514-6255  
[aaron.fleisher@usdoj.gov](mailto:aaron.fleisher@usdoj.gov)

FOR THE DEFENDANTS:

RON O'BRIEN  
FRANKLIN COUNTY  
PROSECUTING ATTORNEY

/s/ Nick A. Soulas, Jr.  
Nick A. Soulas, Jr. (0062166)  
Trial Counsel  
First Assistant Prosecuting Attorney, Civil  
Division  
Mary Jane Martin (0065983)  
Assistant Prosecuting Attorney  
373 South High Street, 13<sup>th</sup> Floor  
Columbus, Ohio 43215  
614/462-3520  
614/462-6012 FAX  
[nasoulas@franklincountyohio.gov](mailto:nasoulas@franklincountyohio.gov)  
[mjmartin@franklincountyohio.gov](mailto:mjmartin@franklincountyohio.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Joint Motion For Entry of Settlement was filed electronically on this 4th day of February, 2011, with the Clerk of Court using the CM/ECF System, which will provide notice of such filing to all registered parties.

s/Aaron Fleisher  
AARON FLEISHER  
Trial Attorney

U.S. Department of Justice  
Civil Rights Division  
Special Litigation Section  
950 Pennsylvania Avenue, N.W.  
Washington, D.C. 20530  
(202) 514-6255  
[aaron.fleisher@usdoj.gov](mailto:aaron.fleisher@usdoj.gov)