## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

Plaintiff,

v.

Civil Action No.: 1:24-cv-02641-RDB

JOHNS HOPKINS HEALTH SYSTEM CORPORATION

Defendant.

## REQUEST FOR STATUS CONFERENCE

- 1. On September 12, 2024, the United States of America filed suit against Johns Hopkins Health System Corporation ("Johns Hopkins") to enforce Title III of the Americans with Disabilities Act ("ADA"), 42 U.S.C. §§ 1281-89, as amended, and its implementing regulation, 28 C.F.R. pt. 36. ECF No. 1.
- 2. That same day, Plaintiff United States of America and Johns Hopkins filed a Joint Motion for Entry of Consent Decree. ECF Nos. 2-3.
- 3. The Consent Decree, if approved and entered by the Court, resolves all claims raised by the Complaint in this action. The Decree provides for both monetary and non-monetary injunctive relief during its two-year term. Under the terms of the Decree, Johns Hopkins will, among other things:
  - a. Pay One Hundred Fifty Thousand Dollars (\$150,000) to compensate multiple affected individuals;
  - b. Update its support person policies to ensure compliance with the ADA;
  - c. Transmit regular reporting to the United States at the time specified in the Consent

Decree on any future complaints during the term of the Consent Decree regarding requests for support persons at Johns Hopkins facilities.

ECF No. 2.2.

- 4. Since these filings, the parties have worked cooperatively together, including Johns Hopkins working with the United States to update its support persons policies to ensure compliance with the ADA.
- 5. To date, this Court has not yet signed off on the parties' Joint Motion for Entry of Consent Decree.
- 6. Should the Court have any questions regarding this Joint Motion, the United States would welcome the opportunity to hold a status conference to address any inquiries this Court may have.

## Respectfully submitted,

DATED: <u>12/18/2024</u>

EREK L. BARRON United States Attorney

/s/ Sarah Marquardt

Sarah Marquardt (No. 17429) Assistant United States Attorney District of Maryland 36 S. Charles Street, 4th Floor Baltimore, MD 21201

Telephone: 410-209-4801

Email: sarah.marquardt@usdoj.gov

KRISTEN CLARKE Assistant Attorney General Civil Rights Division

REBECCA B. BOND Chief AMANDA MAISELS Deputy Chief

/s/ Stephanie Berger
STEPHANIE M. BERGER
Trial Attorney
Disability Rights Section
Civil Rights Division
United States Department of Justice
4 Constitution Square
150 M Street, NE
Washington, DC 20002
Telephone: 202-307-0663

Email: stephanie.berger@usdoj.gov

Counsel for the United States of America