

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

M.C. and T.G., on behalf of themselves and all
similarly situated individuals,

Plaintiffs,

v.

JEFFERSON COUNTY, NEW YORK, et al.,

Defendants.

Case No. 6:22-cv-190 (DNH/ML)

**CONSENT MOTION FOR PRELIMINARY APPROVAL OF PROPOSED
CONSENT DECREE AND APPROVAL OF PROPOSED CLASS NOTICE**

PLEASE TAKE NOTICE THAT Plaintiffs in this action hereby move the Court pursuant to Rule 23(e)(1) of the Federal Rules of Civil Procedure for an order: (1) preliminarily approving the proposed consent decree; (2) approving of the content and method of distribution of the proposed class notice; and (3) scheduling a fairness hearing on the proposed consent decree.

This motion is based on the attached Memorandum of Law; and Affirmation of Antony P. F. Gemmell and exhibits thereto.

Dated: March 26, 2024
New York, New York

NEW YORK CIVIL LIBERTIES UNION
FOUNDATION

/s/ Antony P. F. Gemmell
Antony P.F. Gemmell, #700911
Terry T. Ding, #702578
Gabriella M. Larios, #703415
Molly K. Biklen, #515729
125 Broad Street, 19th Floor
New York, New York 10004
Telephone: 212-607-3300
Facsimile: 212-607-3318
agemmell@nyclu.org

Counsel for Plaintiffs