

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
LOUISVILLE DIVISION**

Filed Electronically

UNITED STATES OF AMERICA,

Plaintiff,

v.

LOUISVILLE/JEFFERSON COUNTY
METRO GOVERNMENT,

Defendant.

Civil Action No. 3:24-CV-00722-BJB

**UNOPPOSED MOTION TO DISMISS AND TO HOLD
PROCEEDINGS IN ABEYANCE PENDING RESOLUTION OF THIS MOTION**

Plaintiff, the United States of America, respectfully moves this Court to dismiss this case with prejudice, without ruling on the parties' joint motion for entry of a consent decree (ECF 4). The United States has conferred with the Louisville/Jefferson County Metro Government, who does not oppose this motion.

In light of this unopposed motion to dismiss, the United States also asks this Court to hold in abeyance any further proceedings, including the required response to this Court's direct questions posed in its January 18, 2025 Order Re: Proposed Consent Decree's Transparency & Support (ECF 54), pending resolution of this motion. If the Court needs further information to rule on this unopposed motion to dismiss, however, the United States will be prepared to discuss this motion at the currently scheduled remote status conference.

Under Federal Rule of Civil Procedure 41, this Court may, at the United States' request, dismiss the Complaint on terms that this Court deems proper. Fed. R. Civ. P. 41(a)(2). Here, dismissal with prejudice is proper. The United States agrees with this Court that it has not yet presented sufficient evidence to support its allegations of a pattern or practice of unconstitutional police conduct in Louisville, much less one serious enough to justify the drastic intervention in the democratic process that the United States previously sought via the proposed consent decree. Additionally, Louisville has informed the United States that if the Court grants the United States' motion, it intends to implement substantially all of the changes to its police department that the proposed consent decree contemplated. Micromanagement by an independent monitor, the Department of Justice, or a federal court is no longer necessary. After an extensive review by new Department of Justice and Civil Rights Division leadership, the United States no longer has confidence in the strength of its case and no longer believes that the proposed consent decree would be in the public interest. The United States therefore does not wish to pursue this action any longer.

Respectfully submitted,

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s/ Jeffrey R. Murray
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CERTIFICATE OF SERVICE

On May 21, 2025, a true and correct copy of the foregoing was filed the Court and served on all Parties, and the prospective intervenors and *amici curiae*, via the court's electronic filing system.

s/ Jeffrey R. Murray
JEFFREY R. MURRAY
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