

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 3:24-cv-00830-DRL-SJF
	)	
CITY OF SOUTH BEND, INDIANA,	)	
	)	
Defendant.	)	

STIPULATION OF DISMISSAL

The parties hereby stipulate to the dismissal with prejudice of the above-captioned case pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii). Rule 41(a)(1)(A)(ii) provides that “the plaintiff may dismiss an action without a court order by filing . . . (ii) a stipulation of dismissal signed by all parties who have appeared.” A stipulation of dismissal pursuant to Rule 41(a) is effective immediately upon filing and no Court order is required. *See Jenkins v. Village of Maywood*, 506 F.3d 622, 624 (7th Cir. 2007).

Date: February 26, 2025

Respectfully submitted,

By:

CHAD MIZELLE
Acting Associate Attorney General

JASON MANION
Counselor to the
Associate Attorney General

ANDREW McCOY WARNER
Deputy Assistant Attorney General
Civil Rights Division

MICHAEL E. GATES
Deputy Assistant Attorney General
Civil Rights Division

/s/ Karen D. Woodard
KAREN D. WOODARD
Chief
U.S. Department of Justice
Civil Rights Division
Employment Litigation Section
150 M Street, NE
Washington, DC 20530
Phone: (202) 514-9878
karen.woodard@usdoj.gov

Counsel for Plaintiff
United States of America

/s/ Erin Linder Hanig
John A. Conway (27712-71)
Erin Linder Hanig (29113-71)
Paul Edgar Harold (25917-71)
Tiernan B. Kane (36452-71)
SOUTHBANK LEGAL
100 E. Wayne Street, Suite 300
South Bend, IN 46601
Telephone: (574) 968-0760
Facsimile: (574) 968-0761
jconway@southbank.legal
ehanig@southbank.legal
pharold@southbank.legal
tkane@southbank.legal

Counsel for Defendant
City of South Bend, Indiana

CERTIFICATE OF SERVICE

On February 26, 2025, I filed a true and correct copy of the foregoing document using the Court's CM/ECF system, which will send a notification of such filing to all counsel of record.

/s/ Juliet E. Gray
Juliet E. Gray