

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

UNITED STATES OF AMERICA	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 2:22-cv-2667
	)	
EVOLVE BANK AND TRUST	)	
	)	
Defendant.	)	
_____	)	

**JOINT MOTION FOR APPROVAL AND ENTRY OF PROPOSED
CONSENT ORDER AND MEMORANDUM IN SUPPORT**

Plaintiff United States of America and Defendant Evolve Bank and Trust (the “Parties”) have agreed upon and jointly move this Court to approve and enter the attached Consent Order as the judgment of the Court. The Parties hereby agree and stipulate to the Court’s entry of this Consent Order in resolution of this litigation. In support of their joint motion, the Parties state as follows:

1. The United States of America filed a Complaint alleging that Evolve Bank and Trust engaged in a pattern or practice of unlawful discrimination in the pricing of mortgage loans in violation of the Fair Housing Act (“FHA”), 42 U.S.C. §§ 3601–3619 and the Equal Credit Opportunity Act (“ECOA”), 15 U.S.C. §§ 1691–1691f. Evolve Bank and Trust denies these allegations.

2. The Parties have resolved the claims raised in the Complaint and seek entry of the proposed Consent Order.

3. The Court has jurisdiction over the parties and subject matter of this action. There have been no factual findings or adjudication in this case.

4. The Parties agreed to the terms stated in their proposed Consent Order to voluntarily resolve all claims arising from the conduct alleged in the Complaint.

5. Entry of this Consent Order is in the public interest.

6. The Parties have been engaging in discussions, including telephone and email communications on September 21, 2022. Counsel for both Parties confirm they are in agreement as to the relief sought herein.

7. Accordingly, the Parties respectfully request that this Court approve and enter the proposed Consent Order.

Respectfully submitted,

Dated: September 29, 2022

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