

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF INDIANA
FORT WAYNE DIVISION**

LAUREN RICHWINE and DEATH DONE
DIFFERENTLY LLC,

Plaintiffs,

v.

KATHLEEN DIANE MATUSZAK,
THOMAS SPROLES, FRANK DOWNING,
and CHRISTOPHER COOKE, in their
official capacities as members of the Indiana
State Board of Funeral & Cemetery Service;
THEODORE ROKITA, in his official
capacity as Attorney General of Indiana; and
LINDSAY HYER, in her official capacity as
Executive Director of the Indiana Professional
Licensing Agency,

Defendants.

Case No. 1:23-cv-370-HAB-ALT

JOINT MOTION TO ENTER CONSENT DECREE

Pursuant to Local Rule 16-1(g), Plaintiffs Lauren Richwine and Death Done Differently LLC and Defendants Kathleen Diane Matuszak, Thomas Sproles, Frank Downing, Christopher Cooke, Theodore Rokita, and Lindsay Hyer (collectively the “Parties”) jointly notify the Court that they have reached a complete settlement. Having fully settled the case, the parties move this Court to approve and enter the Consent Decree attached as Exhibit A. In support of this motion, the Parties jointly state the following:

1. The Parties have determined that further litigation of Plaintiffs’ claims is unnecessary and would merely create undue burden, expense, and delay.

2. The Parties extensively negotiated the proposed Consent Decree, and its terms are fair, adequate, reasonable, consistent with the law, and in the public interest.

3. The proposed Consent Decree resolves all claims in Plaintiffs' Complaint and resolves all claims for attorneys' fees.

For these reasons, the Parties request that the Court grant this Joint Motion to Enter Consent Decree, approve and enter the Consent Decree attached as Exhibit A, and retain jurisdiction to monitor and enforce the Consent Decree's terms.

RESPECTFULLY SUBMITTED this 12th day of May 2026.

PLAINTIFFS

By: /s/ Benjamin A. Field

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CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of May, 2026, a true and correct copy of the foregoing was filed via the ECF system and that all parties of record were thereby electronically served.

/s/ Benjamin A. Field

Benjamin A. Field

Counsel for Plaintiffs