

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION**

BERYL N. JONES, ET AL.,	*	
Plaintiffs	*	
UNITED STATES OF AMERICA,	*	
Plaintiff-Intervenor,	*	Civil Action No: 5:65-cv-11055 AVH
Vs.	*	
CADDO PARISH SCHOOL BOARD,	*	
Defendants	*	Hon. Alexander C. Van Hook

JOINT STIPULATION TO DISMISS CASE WITH PREJUDICE

The United States of America (hereinafter “United States”), Plaintiff-Intervenor and representative of the interests of all private plaintiffs pursuant to this Court’s September 26, 2001, Ruling, and defendant Caddo Parish School Board, both through undersigned counsel, hereby STIPULATE as follows:

- 1) Whereas, the initial Plaintiffs in the case are no longer parties to this action, and their interests are represented by Plaintiff-Intervenor United States of America. [Sept. 26, 2001 Ruling, at p. 3 (attached hereto).]
- 2) Whereas, the proposed intervenors Ms. Angela Wells on behalf of her minor child J.W. and the Louisiana State Conference of the NAACP have not been granted leave to intervene;
- 3) Whereas the undersigned parties in this case agree that the Caddo Parish School District has achieved unitary status; and
- 4) Whereas, the undersigned understand that the filing of a Rule 41(a)(1)(A)(ii) dismissal stipulation “ends a case without a judge’s

involvement.” *Smith v. Sch. Bd. of Concordia Par.*, __ F.4th __, 2026 U.S. App. LEXIS 20639, *2.

NOW THEREFORE, the undersigned hereby stipulate that this Case is hereby DISMISSED with prejudice in its entirety.

Pursuant to Rule 41, the parties understand that **no further action** is to be taken in the case, no further documents are to be filed, and no further consideration of the motion to intervene will occur. *Smith, supra*, 2026 U.S. App. LEXIS 20639, *3 (asking “whether a district court may go on adjudicating a case after every remaining party has dismissed it under Rule 41(a)(1)(A)(ii). It may not.”)

DATED: July 17, 2026

Respectfully submitted,

<u>/s/ Karen J. King</u> KAREN J. KING (#23508) Assistant United States Attorney 800 Lafayette Street, Suite 2200 Lafayette, Louisiana 70501 Telephone: (337) 262-6618 Facsimile: (337) 262-6693 Email: karen.king@usdoj.gov	HARMEET K. DHILLON Assistant Attorney General JEFFREY MORRISON Deputy Assistant Attorney General <u>/s/ John P. Mertens</u> PETER FEAMAN FL Bar No. 260347 Senior Counsel JOHN P. MERTENS UT Bar No. 14522 Acting Chief, Educational Opportunities Section Civil Rights Division U.S. Department of Justice 950 Pennsylvania Ave. NW Washington, DC 20530 Telephone: (202) 532-3893 Email: John.Mertens@usdoj.gov ATTORNEYS FOR PLAINTIFF UNITED STATES OF AMERICA
	LAW OFFICE OF REGINALD W. ABRAMS, SR. <u>By: /s/ Reginald W. Abrams</u> Reginald W. Abrams, Sr., T.A., Bar No. 18084 330 Marshall Street, Suite 707 Shreveport, LA 71101 Telephone: (318) 222-9100 Fax: (318) 222-9191 Email: rabrams@abramslawoffice.com ATTORNEY FOR DEFENDANT CADDO PARISH SCHOOL BOARD