

THE HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

CITY OF SEATTLE,

Defendant.

No. 2:17-cv-01282-JLR

**UNITED STATES’ MEMORANDUM IN
SUPPORT OF CITY’S SUSTAINMENT
PERIOD PLAN**

Plaintiff the United States of America (“United States”) hereby submits its concurrence to the Sustainment Period Plan filed by Defendant City of Seattle (“City”). By its order dated January 10, 2018, the Court instructed the parties and the Monitor to file a “joint plan for discharging their obligations under the Consent Decree during the Phase II sustainment period.” (Dkt. #439). Since that time, the City, the Monitor, and the United States engaged in extensive discussions and through those discussions were able to reach agreement on a unified plan. That plan is captured by the City’s filing, including the Sustainment Period Matrix attached as Exhibit A. The United States, therefore, concurs that the City’s filing (and Exhibit A) should be used as the governing document for this next, important phase of work under the Consent Decree.

Respectfully submitted this 2nd day of March, 2018.

For the UNITED STATES OF AMERICA:

ANNETTE L. HAYES
United States Attorney for the
Western District of Washington

JOHN M. GORE
Acting Assistant Attorney General
Civil Rights Division

s/Christina Fogg
Kerry J. Keefe, Civil Chief
Christina Fogg, Assistant United States Attorney
United States Attorney's Office
Western District of Washington
700 Stewart Street, Suite 5220
Seattle, Washington 98101-1271
Phone: (206) 553-7970
Fax: (206) 553-4073

s/Timothy Mygatt
Steven H. Rosenbaum, Chief
Timothy D. Mygatt, Deputy Chief
Jeffrey R. Murray, Trial Attorney
United States Department of Justice
Civil Rights Division
Special Litigation Section
950 Pennsylvania Avenue, NW
Washington, DC 20530
Phone: (202) 514-6255

CERTIFICATE OF SERVICE

I certify that on the 2nd day of March, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following attorneys of record:

Gary T Smith	gary.smith@seattle.gov
Hillary H McClure	hillarym@vjmlaw.com
Carlton Wm Seu	carlton.seu@seattle.gov
Kerry J. Keefe	Kerry.Keefe@usdoj.gov
Timothy Mygatt	Timothy.Mygatt@usdoj.gov
Annette L. Hayes	Annette.Hayes@usdoj.gov
Christina Fogg	Christina.Fogg@usdoj.gov
Peter S. Holmes	Peter.Holmes@seattle.gov
Brian G. Maxey	Brian.Maxey@seattle.gov
Gregory C. Narver	Gregory.Narver@seattle.gov
Rebecca Boatright	Rebecca.Boatright@seattle.gov
Peter S. Ehrlichman	Ehrlichman.Peter@dorsey.com
Ronald R. Ward	Ron@wardsmithlaw.com
Matthew Barge	Matthewbarge@parc.info
Eric M. Stahl	Ericstahl@dwt.com
Kristina M Detwiler	kdetwiler@unionattorneysnw.com
Josh Johnson	josh.johnson@seattle.gov

DATED this 2nd day of March, 2018.

/s/ Brittany Cirineo
Brittany Cirineo, Paralegal (Contractor)