UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

)	
JEFFREY BARHAM, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 02-2283 (EGS)
)	
CHIEF CHARLES H. RAMSEY, et al.)	
)	
Defendants.)	
)	

JOINT MOTION FOR PRELIMINARY APPROVAL OF PROPOSED CLASS SETTLEMENT AND, NOTICE TO CLASS, AND NOTICE OF FAIRNESS HEARING

By and through their undersigned counsel, the class representatives in this action ("Class Representatives")¹ and the certified class of Plaintiffs (collectively, the "Plaintiff Class" or "Plaintiffs") and the United States of America; Sally Jewell, U.S. Secretary of the Interior, in her official capacity; Loretta E. Lynch, the U.S. Attorney General, in her official capacity; and former-Major Richard Murphy ("Major Murphy") of the U.S. Park Police (the "Park Police") in his individual and official capacities (collectively, the "Federal Defendants") respectfully move the Court for an order (1) granting preliminary approval of the proposed Class Settlement Agreement; (2) approving the accompanying Notices to the Class, Proof of Claim form, and procedures for mailing, publication and internet posting stated in the accompanying proposed order; and (3) setting June 15, 2015 as the deadline for class member responses to the notice, requesting exclusion or asserting objections.

The Class Representatives are Mary Canales, William Durham, Noah Falk, Jorge Garcia-Spitz, Mark Allan Jackson, Casey Legler, Charlcie Legler, Sally A. Norton, John Passacantando, Joseph Phelan, Nicole Prichard, Morgan Ress, Macdonald Scott, Jeri Wohlberg, Lesley Wood, Samantha Young, and Stephen Zimmerman.

As described herein, the parties propose the following deadlines:

May 15, 2015 – Initial notices sent by mail

June 15, 2015 - Deadline for new Claimants to file Proof of Claim Form, object, or opt

out

June 22, 2015 - Class Administrator files final report with Court

June 22, 2015 – Parties file responses to any objections

2015 – Fairness hearing

In support of this Motion, the parties rely on the accompanying memorandum. Also, a proposed order is enclosed herewith.

Respectfully submitted,

Carl Messineo, D.C. Bar #450033

Mara Verheyden-Hilliard, D.C. Bar #450031

PARTNERSHIP FOR CIVIL JUSTICE

617 Florida Avenue, NW

Washington, DC 20001

(202) 232-1180

Attorneys for the Plaintiff Class

VINCENT H. COHEN, JR., D. Bar #471489 Acting United States Attorney

DANIEL F. VAN HORAL D.C. Bar #924092 Chief, Civil Division

By: Mel

MARINA UTGOFF BROWELL,

D.C. Bar #416587

BRIAN P. HUDAK

Assistant United States Attorneys

555 Fourth Street, NW Washington, DC 20530

Washington, DC 20530

(202) 252-2549

Attorneys for the Federal Defendants

As reflected in the supporting memorandum, claimants who participated in the District of Columbia Settlement will not need to submit a new claim form to be deemed eligible and participating in the Proposed Settlement. By default, such persons are automatically deemed participants in the Proposed Settlement without need for further action. Should any wish to opt out or exclude themselves, they can do so upon their own initiative.