IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF FLORIDA PANAMA CITY DIVISION

JAMES H. GLENN, et al.,

:

Plaintiffs, :

and :

JACKSON COUNTY :

BRANCH OF THE NAACP, :

: Case No. 5:84-CV-2109-RV

Plaintiff-Intervenor,

:

v. :

JACKSON COUNTY :

SCHOOL BOARD, et al.,

:

Defendants. :

JOINT MOTION TO APPROVE CONSENT JUDGMENT

Plaintiff-Intervenor JACKSON COUNTY BRANCH OF THE NAACP and Defendant JACKSON COUNTY SCHOOL BOARD jointly move this Court to approve and enter the attached Proposed Consent Judgment, resolving the claims pleaded in Plaintiff-Intervenor's Complaint-in-Intervention (ECF 49-1), for the reasons stated therein. The Plaintiff Class consents to this Motion.

WHEREFORE, Plaintiff-Intervenor and Defendant respectfully request that the Court approve and enter the Proposed Consent Judgment as this Court's Judgment in this matter.

Respectfully submitted, this 4th day of March, 2022.

s/Nicholas Warren

Nicholas Warren Florida Bar No. 1019018

ACLU FOUNDATION OF FLORIDA, INC.

336 East College Ave., Suite 203 Tallahassee, FL 32301 (786) 363-1769 nwarren@aclufl.org

Daniel B. Tilley Florida Bar No. 102882 **ACLU FOUNDATION OF FLORIDA, INC.** 4343 West Flagler Street, Suite 400 Miami, FL 33134

(786) 363-2714 dtilley@aclufl.org

Class Counsel and Counsel for Plaintiff-Intervenor, the Jackson County Branch of the NAACP

s/H. Matthew Fuqua

H. Matthew Fuqua Florida Bar No. 0451101 FUQUA & MILTON, P.A. 4450 Lafayette Street (32446) Post Office Box 1508 Marianna, FL 32447 (850) 526-2263 mfuqua@fmc.legal

Counsel for Defendant, Jackson County School Board