## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF WISCONSIN

JEANINE B., BY HER NEXT FRIEND ROBERT BLONDIS, et al.,

Plaintiffs,

v.

Case No. 2:93-CV-000547

TONY EVERS, et al.,

Defendants.

## JOINT MOTION TO TERMINATE SETTLEMENT AGREEMENT AND CONSENT DECREE ON GROUNDS OF SUBSTANTIAL COMPLIANCE

NOW COME Plaintiffs and Defendants, by and through their undersigned counsel, and hereby move this Court for an Order pursuant to Fed. R. Civ. P. 60(b)(5) terminating the modified settlement agreement entered into by the parties and approved by the Court in a consent decree entered on December 2, 2002 (Dkt. 509), as modified and approved by the Court on November 14, 2003, and May 31, 2012 (Dkts. 517, 569). A Joint Brief of the parties is submitted herewith, with other materials in support of this motion to be filed pursuant to a schedule ordered by the Court.

Dated: February 3, 2021

Respectfully submitted,

FOR PLAINTIFFS:

s/Eric E. Thompson ERIC E. THOMPSON Mass. BBO #565100

Children's Rights 88 Pine Street, Suite 800 New York, New York 10005 (917) 533-1161 (212) 683-4015 (Fax) ethompson@childrensrights.org

## FOR DEFENDANTS:

JOSHUA L. KAUL Attorney General of Wisconsin

s/Rebecca Paulson REBECCA PAULSON Assistant Attorney General State Bar # 1079833

s/Jennifer R. Remington
JENNIFER R. REMINGTON
Assistant Attorney General
State Bar # 1098838

Attorneys for Defendants

Wisconsin Department of Justice Post Office Box 7857 Madison, Wisconsin 53707-7857 (608) 266-0278 (Paulson) paulsonra@doj.state.wi.us (608) 267-2230 (Remington) remingtonjr@doj.state.wi.us (608) 267-8906 (Fax)