

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 20-cv-11551-RWZ
)	
PRTAYLOR ENTERPRISES LLC d/b/a)	
FATHER & SON MOVING & STORAGE,)	
)	
Defendant.)	
_____)	

UNITED STATES’ ASSENTED-TO MOTION TO ENTER CONSENT DECREE

The plaintiff United States of America, with the consent of the defendant, PRTaylor Enterprises LLC, hereby moves the Court to enter the attached consent decree. The grounds for this motion are set forth in the consent decree, attached hereto as Exhibit A.

Respectfully submitted,

NATHANIEL R. MENDELL
Acting United States Attorney
District of Massachusetts

KRISTEN CLARKE
Assistant Attorney General
Civil Rights Division

/s/ Torey B. Cummings
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Dated: September 16, 2021

RULE 7.1 CERTIFICATION

I hereby certify that I have conferred with the defendant in accordance with L.R. 7.1(A)(2).

/s/ Torey B. Cummings _____

TOREY B. CUMMINGS

Assistant United States Attorney

Dated: September 16, 2021

CERTIFICATE OF SERVICE

I hereby certify that, on this 16th day of September 2021, the foregoing document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Torey B. Cummings _____

TOREY B. CUMMINGS

Assistant United States Attorney