

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

JANE DOE, et al.,

Plaintiffs,

and

UNITED STATES OF AMERICA,

Plaintiff-Intervenor

v.

SCHUYLKILL COUNTY; GEORGE
HALCOVAGE (in his individual
capacity); GLENN ROTH (in his
individual capacity); GARY
BENDER (in his individual capacity);
HEIDI ZULA (in her individual
capacity); and DOREEN KUTZLER
(in her individual capacity)

Defendants.

Case No. 3:21-cv-477-MCC

**JOINT MOTION FOR APPROVAL
AND ENTRY OF CONSENT DECREE**

Plaintiff-Intervenor United States of America (“United States”) and Defendant Schuylkill County (“County”) jointly move the Court to approve and enter the attached proposed Consent Decree (“Decree”) resolving the United States’ Complaint (ECF No. 139) in the above-captioned case. After engaging in settlement discussions, the United States and the County have agreed to settle the United

States' claims through entry of the Decree to avoid the risks and burdens of contested litigation. The Decree, if approved and entered by the Court, would not constitute an adjudication or finding on the merits of the United States' claims, but it would resolve the legal dispute between the United States and the County that is based on the charges of discrimination filed by the Jane Doe Plaintiffs with the Equal Employment Opportunity Commission.

The Jane Doe Plaintiffs are not parties to the Decree and are separately represented by private counsel. The Jane Doe Plaintiffs' claims set forth in their Second Amended and Supplemented Complaint (ECF No. 63) would remain before this Court for adjudication if the Court approves and enters the Decree.

As indicated in the attached Certificate of Concurrence, all parties consent to this motion.

The United States and the County respectfully request that the Court enter and approve the attached proposed Consent Decree.

Respectfully submitted,

Date: January 13, 2023

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CERTIFICATE OF SERVICE

I hereby certify that on January 13, 2023, a true and accurate copy of the foregoing Motion was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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