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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Plaintiff,

v.

THE CITY OF PORTLAND,

Defendant.

Case No. 3:12-cv-02265-SI

JOINT STATUS REPORT FOLLOWING
MEDIATION PURSUANT TO PARAGRAPH
182

Plaintiff United States of America and Defendant City of Portland (City) jointly submit this status report following mediation pursuant to Paragraph 182 of the Amended Settlement Agreement (Agreement), previously entered in this matter (ECF No. 262).

On September 8, September 24, October 6, October 13, and October 20, the United States and the City met in mediation, along with the Intervenor-Defendant Portland Police Association (PPA), the Enhanced Amicus Curiae Albina Ministerial Alliance Coalition for Justice and Police Reform (AMAC), and Amicus Curiae Mental Health Alliance (MHA). *See* ECF Nos. 256, 263, 266, 267, 268. United States Magistrate Judge Stacie Beckerman facilitated the mediation.

In advance of the Court's status conference set for November 9, 2021, the United States and the City hereby advise the Court and the public of the mediation's outcome, consisting of proposed amendments to add new Section XI – Addendum of Additional Remedies to the Agreement. The proposed Section XI contains eight paragraphs, numbered 188 to 195, which identify actions the City will take to resolve compliance concerns raised by the United States.¹ The United States has approved the terms of the proposed amendments. A formal joint motion to amend the Agreement cannot be filed with the Court until the City approves the proposed amendments, as required by Paragraph 184. We have been advised that the PPA will not object to the proposed amendments.

The United States and the City understand that after we file a joint motion to amend the Agreement, the Court would hold a fairness hearing to determine whether Section XI is fair, adequate, and reasonable. The City anticipates City Council will vote on the amendments in early December, after which the parties would immediately file a joint motion to amend the Agreement. We will be prepared to discuss potential dates for a fairness hearing at the Court's status conference on November 9, 2021.

¹ The proposed Section XI is attached as Exhibit 1.

DATED: November 8, 2021.

Respectfully submitted,

FOR THE UNITED STATES:

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