

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

UNITED STATES OF AMERICA

Plaintiff,

v.

STATE OF RHODE ISLAND

Defendant.

Case No. CA 14-175

**UNITED STATES OF AMERICA'S MOTION TO
HOLD THE STATE OF RHODE ISLAND IN CONTEMPT OF
THE CONSENT DECREE ENTERED APRIL 9, 2014**

The United States of America brings this Motion as a result of the State of Rhode Island's failure to comply with Sections IV, VI, XI, and XIV of the Consent Decree in this matter (ECF No. 5), which this Court entered on April 9, 2014. The United States asks this Court to hold the State in contempt and command the relief set forth in the proposed order filed with this Motion.

In support, the United States relies on and incorporates the accompanying Memorandum and exhibit. After the October 8, 2021 close of discovery, the United States will supplement the facts cited in the Memorandum with additional evidence, including the evidence presented at the hearing scheduled for October 18-22, 2021. *See* Order, July 29, 2021 (ECF No. 144) (scheduling close of discovery and evidentiary hearing). With the Court's permission, the United States will also prepare, at that time, an amended proposed order containing specific factual findings and further detail.

Dated: August 16, 2021

Respectfully submitted,

For the United States of America:

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