

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO

SAM DOE 1, et al.,)	
)	
Plaintiffs,)	
)	CASE NO. 2:13-cv-112
-vs-)	
)	JUDGE ALGENON L. MARBLEY
JACKSON CITY SCHOOL DISTRICT, et al.,)	
)	
Defendants.)	

NOTICE OF SETTLEMENT AND JOINT MOTION TO
VACATE SHOW CAUSE ORDERS (DOCS 41 and 43)

The Parties, by and through counsel, hereby give notice to the Court that the within matter has been settled. The terms of the settlement are set forth in the handwritten Settlement Agreement signed by the Parties at the Settlement Conference held on July 2, 2013 before Magistrate Judge Mark Abel. The Agreement is contingent upon (1) approval by the Court of a Consent Decree prohibiting the Defendants from maintaining or displaying the portrait of Jesus which was previously displayed in the Jackson City Schools, (2) Plaintiffs providing to Defendants releases of all claims that were or could have been brought relative to the portrait and, (3) approval of the settlement for the claim by the minor Plaintiffs by the Jackson County Probate Court.

Based on the foregoing, the Parties jointly move the Court to vacate the Show Cause Orders (Docs 41 and 43), cancel the Show Cause hearing scheduled for July 12, 2013 and continue this matter for no less than sixty (60) days to enable the parties to resolve all extant issues and submit to the Court a Consent Decree and Dismissal Entry, dismissing with prejudice the litigation.

Respectfully submitted

/ James L. Hardiman

James L. Hardiman (0031043)
TRIAL ATTORNEY
jhardiman@acluohio.org
Jennifer Martinez Atzberger (0072114)
jatzberger@acluohio.org
Michael Honohan (0014082)
mhonohan@acluohio.org
American Civil Liberties Union of Ohio
Foundation
4506 Chester Avenue
Cleveland, OH 44103
(216) 473-2220

Rebecca S. Markert (1063232)
rmarkert@ffrf.org
Pro Hac Vice
Freedom from Religion Foundation
P.O. Box 750
Madison, WI 53701
(608) 256-8900

/ John C. Albert /

John Curtis Albert (0024164)
TRIAL ATTORNEY
jalbert@cbjlawyers.com
Brian E. Hurley (0007827)
bhurley@cbjlawyers.com
Daniel J. Hurley (0034499)
dhurley@cbjlawyers.com
Crabbe, Brown & James
500 South Front Street—Suite 1200
Columbus, Ohio 43215
(614) 229-4528

Hiram S. Sasser, III
Liberty Institute
2001 West Plano Parkway, Suite 1600
Plano, Texas 75075
(972) 941-4444