

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**THE NATIONAL FEDERATION  
OF THE BLIND OF VIRGINIA, *et al.*,**

**Plaintiffs,**

**Case No. 3:23-cv-127-HEH**

**v.**

**VIRGINIA DEPARTMENT OF  
CORRECTIONS, *et al.*,**

**Defendants.**

**JOINT MOTION TO DISMISS WITH PREJUDICE AND TO  
RETAIN JURISDICTION TO ENFORCE SETTLEMENT AGREEMENT**

Plaintiffs National Federation of the Blind of Virginia, Nacarlo Courtney, William Hajacos, Michael McCann, and Kevin Muhammad Shabazz, and Defendant Virginia Department of Corrections (collectively, “the Parties”), having resolved their claims by separate agreement in this case, hereby stipulate that this case be dismissed with prejudice pursuant to Rule 41(a)(1)(A)(ii).

Additionally, the Parties move this Court for an order dismissing this case with prejudice and retaining jurisdiction to enforce the Settlement Agreement between the Parties (attached as Exhibit 1). The grounds for this motion are as follows:

1. The Parties executed a Settlement Agreement in this case on May 31, 2024. *See generally* Ex. 1.
2. Pursuant to Paragraph 6 of the Settlement Agreement, Parties request that the Court retain jurisdiction to enforce the Settlement Agreement for a term of two (2) years. *Id.* ¶ 6.

3. Defendant agrees to attend a status conference before Judge Mark R. Colombell every six months during the course of the Court's jurisdiction to report on the progress of VDOC's implementation of the Settlement Agreement. *Id.*

For the foregoing reasons, the Parties stipulate that this action be dismissed and request that this court retain jurisdiction of the attached Settlement Agreement. A proposed order is attached to this Motion.

Dated: June 5, 2024

Respectfully submitted,

/s/ Eve L. Hill

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 5th day of June 2024, I filed the foregoing electronically with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (“NEF”) to the following:

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I hereby certify that I will mail the foregoing document by U.S. Mail and electronic mail to the following non-filing user:

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        /s/ Eve L. Hill          
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