

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
Northern Division

UNITED STATES OF AMERICA,	)	
	)	
	)	
Plaintiff,	)	
	)	Case No. 3:22-cv-00686-HTW-LGI
	)	
v.	)	
	)	
THE CITY OF JACKSON, MISSISSIPPI,	)	
	)	
Defendant.	)	
_____	)	

**UNOPPOSED MOTION TO ENTER INTERIM STIPULATED ORDER**

Plaintiff, the United States of America, on behalf of the U.S. Environmental Protection Agency, moves the Court to sign and enter the proposed Interim Stipulated Order appended as **Attachment A**. In support of its motion, the United States contemporaneously files a Memorandum Brief and the following documents:

- Attachment A: Proposed Interim Stipulated Order;
- Attachment B: Declaration of Brian Smith;
- Attachment C: Declaration of Bryan Myers; and
- Attachment D: Declaration of Edward Henifin.

**CONCLUSION**

The Court should sign and enter the proposed Interim Stipulated Order for the reasons stated in the United States’ Memorandum Brief. Defendant, the City of Jackson, Mississippi (“the City”), consents to the relief requested in the United States’ motion. The proposed Order would (1) set forth a Priority Projects List with critical steps needed to stabilize the City’s drinking water system, remedy problems that contributed to the water crisis, and establish

sustainable practices for the future; (2) appoint Mr. Edward “Ted” Henifin as the Interim Third-Party Manager to manage and operate the City’s drinking water system and implement the Priority Projects List; and (3) stay this matter for a period of six months, during which time the Parties will begin negotiations on a consent decree that addresses the City’s long-term compliance with the Safe Drinking Water Act.

Respectfully submitted,

TODD KIM  
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U.S. Department of Justice

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