

1 ERIC S. DREIBAND
Assistant Attorney General
2 Civil Rights Division
SAMEENA SHINA MAJEED
3 Chief
R. TAMAR HAGLER
4 Deputy Chief
KATHRYN LEGOMSKY
5 MAX LAPERTOSA
ALAN MARTINSON
Trial Attorneys
6 Housing and Civil Enforcement Section
Civil Rights Division
7 U.S. Department of Justice
950 Pennsylvania Ave., N.W.—4 CON
8 Washington, D.C. 20530
Phone: (202) 305-1077
9 Fax: (202) 514-1116

10 *Attorneys for the United States of America*

11 OFFICE OF THE ATTORNEY GENERAL
LEVIN TAITANO CAMACHO
12 Attorney General of Guam
Litigation Division
13 590 South Marine Corps Drive, Suite 802
Tamuning, Guam 96913
14 Phone: (671) 475-3324
15 Fax: (671) 472-2493

16 *Attorneys for the Government of Guam and the Administrative Director of the Chamorro Land
17 Trust Commission*

18 LAW OFFICES OF PHILLIPS & BORDALLO, P.C.
410 West O'Brien Drive, Suite 102
19 Hagåtña, Guam 96910-5044
Phone: (671) 477-2223
20 Fax: (671) 477-2329

21 *Attorneys for the Chamorro Land Trust Commission*

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE TERRITORY OF GUAM

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 vs.

6 GOVERNMENT OF GUAM; CHAMORRO
7 LAND TRUST COMMISSION; and
8 ADMINISTRATIVE DIRECTOR OF THE
9 CHAMORRO LAND TRUST
COMMISSION,

10 Defendants.

CIVIL CASE NO. 17-00113

JOINT MOTION TO DISMISS

11 Plaintiff, the United States of America, and defendants, the Government of Guam, the
12 Chamorro Land Trust Commission, and its Administrative Director (“Parties”) respectfully move
13 this Court to dismiss this case pursuant to Federal Rule of Civil Procedure 41(a)(2) and the
14 attached settlement agreement, which the Parties executed on June 4, 2020, and which resolves
15 the United States’ claims against defendants. As stated in Paragraph 34 of the settlement
16 agreement, the Parties agree that this case should be dismissed with prejudice, except that the
17 parties request that this Court retain jurisdiction to consider the United States’ unopposed motion
18 for vacatur pursuant to Paragraph 25 of the settlement agreement. The Parties further agree that
19 each Party shall bear its own attorneys’ fees and costs in connection with this case.
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1 Dated: June 4, 2020.

2 Respectfully submitted,

3 ERIC S. DREIBAND
4 Assistant Attorney General
Civil Rights Division

5 s/ Max Lapertosa
6 SAMEENA SHINA MAJEED
Chief

7 R. TAMAR HAGLER
Deputy Chief
8 KATHRYN LEGOMSKY
MAX LAPERTOSA
9 ALAN MARTINSON
Trial Attorneys
10 United States Department of Justice
Housing and Civil Enforcement Section
11 Civil Rights Division

12 *Attorneys for the United States*

13
14 OFFICE OF THE ATTORNEY GENERAL
Leevin Taitano Camacho, Attorney General

15 s/ James L. Canto II
16 JAMES L. CANTO II
Acting Deputy Attorney General

17 *Attorney for the Government of Guam and the*
18 *Administrative Director of the Chamorro Land*
19 *Trust Commission*

20 PHILLIPS & BORDALLO, P.C.

21 s/ Michael F. Phillips
22 MICHAEL F. PHILLIPS

23 *Attorney for the Chamorro Land Trust*
24 *Commission*