

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

BROOKE WHORLEY, *et al.*,

Plaintiffs,

v.

Case No. 3:20-cv-00255

RALPH NORTHAM, *et al.*,

Defendants.

**JOINT STATUS REPORT REQUESTING TERMINATION OF FEDERAL COURT
JURISDICTION**

Brooke Whorley, *et al.*, (“Plaintiffs”) and Ralph Northam, *et al.*, (“Defendants”) (collectively, “the parties”), having entered into a private agreement (“Private Agreement”), hereby provide the following status update to the Court and jointly request that the Court terminate its jurisdiction to enforce the original settlement agreement (“Stipulated Settlement Agreement”) between the parties (ECF No. 11-1).

1. On May 11, 2020, the parties entered into a Stipulated Settlement Agreement to resolve outstanding issues in this case and jointly moved this Court to dismiss this action and retain jurisdiction for the limited purpose of enforcing the Stipulated Settlement Agreement.

2. By letter to the Court dated April 2, 2021, and pursuant to paragraph 9 of the Stipulated Settlement Agreement, Defendants requested termination of federal court jurisdiction over this action as well as relief from the Court’s earlier decision to require Defendants to conduct at least 60 reviews per week under the Inmate Early Release Plan (ECF No. 88).

3. On April 14, 2021, the Court granted Defendants relief from the requirement to review at least 60 individuals per week and to provide weekly status updates to the Court, but

denied Defendants' request for termination of federal court jurisdiction (ECF 92). The parties agreed to continue to negotiate to resolve outstanding issues and reach a mutually-agreeable resolution.

4. On May 28, 2021, the parties entered into the Private Agreement, attached as Exhibit A, that supersedes the Stipulated Settlement Agreement and contemplates the termination of federal jurisdiction over disputes arising out of any settlement agreements between the parties in this action. Pursuant to paragraph 9 of the Stipulated Settlement Agreement, the parties hereby jointly request this Court terminate its jurisdiction to enforce the Stipulated Settlement Agreement.

Respectfully Submitted,

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