

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT**

CARING FAMILIES PREGNANCY SERVICES)	
INC. d/b/a MOBILE CARE,)	
)	
Plaintiff,)	Case No.: 3:19-CV-00584-JCH
)	
v.)	July 22, 2020
)	
CITY OF HARTFORD,)	
)	
Defendant.)	

JOINT MOTION TO DISMISS PURSUANT TO SETTLEMENT AGREEMENT

The Parties, having reached a settlement agreement to resolve the issues in this case, hereby move the Court to so order the settlement agreement and dismiss the case in accordance with its terms. As the basis for this motion, the Parties state as follows:

1. Plaintiff alleged that Ordinance No. 25-17, codified at Hartford Municipal Code §§ 17-161 to 17-166, violates the First and Fourteenth Amendments of the U.S. Constitution; Article 1, Section 3 of the Connecticut Constitution; and Section 52-571b of the Connecticut General Statutes. (ECF No. 1)
2. Defendant denied these allegations. (ECF No. 23)
3. The Parties conducted discovery and cross-moved for summary judgment on May 19, 2020. (ECF Nos. 59-60)
4. On June 30, 2020, the Parties entered into a settlement agreement (the “Settlement Agreement”), which is attached as Exhibit A, and incorporated in this motion by reference.
5. The Parties concur that the Settlement Agreement fully resolves their dispute.
6. Thus, the Parties ask the Court to so order the Settlement Agreement and dismiss the lawsuit in accordance with its terms.

Dated: July 22, 2020

Respectfully submitted,

By: /s/ Kevin Theriot

Denise M. Harle*
Bar No. PHV CT10058
ALLIANCE DEFENDING
FREEDOM
1000 Hurricane Shoals Road
NE,
Suite D-1100
Lawrenceville, Georgia 30043
770-339-0774
dkharle@adflegal.org

Kevin Theriot*

Bar No. PHV CT17549
Samuel D. Green*
Bar No. PHV CT10538
ALLIANCE DEFENDING
FREEDOM
15100 N. 90th St.
Scottsdale, Arizona 85260
480-444-0020
ktheriot@adflegal.org

By: /s/ Stephanie Toti

Stephanie Toti*
Bar No.: phv10084
Juanluis Rodriguez*
Bar No.: phv10512
LAWYERING PROJECT
25 Broadway, 9th Fl.
New York, NY 10004
646-490-1083
stoti@lawyeringproject.org
prodiguez@lawyeringproject.org
[org](http://www.lawyeringproject.org)

Sneha Shah*

Bar No.: phv10499
LAWYERING PROJECT
300 Morris St.
Durham, NC 27701
646-490-1225
sshah@lawyeringproject.org

Rupali Sharma*

Bar No.: phv10467
LAWYERING PROJECT
110 Winter St., Ste. 4
Portland, ME 04102
908-930-6645
rsharma@lawyeringproject.org

Howard G. Rifkin
Corporation Counsel
Bar No.: ct29978
Lori A. Mizerak
Asst. Corporation Counsel
Bar No.: ct26192
CITY OF HARTFORD
550 Main Street, Rm. 210
Hartford, CT 06103
860-757-9700
howard.rifkin@hartford.gov
mizel001@hartford.gov

Priscilla Joyce Smith
Bar No.: ct30569
YALE LAW SCHOOL RRJP
CLINIC
319 Sterling Pl.
Brooklyn, NY 11238
347-262-5177
priscilla.smith@yale.edu

Attorneys for Plaintiff

Attorneys for Defendant

*Admitted *Pro Hac Vice*

CERTIFICATE OF SERVICE

I hereby certify that, on July 22, 2020, a true and complete copy of the foregoing document was served on all counsel of record via the Court's CM/ECF system.

/s/ Stephanie Toti

Stephanie Toti