

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

RYAN WOODHOUSE,

Plaintiff,

v.

Case No. 13-CV-310

CITY OF LA CROSSE, WISCONSIN;
STEVE CARLYON, RONALD TISCHER,
KIRK FLATTEN and TIMOTHY O'NEILL,

Defendants.

CONSENT ORDER AND JUDGMENT

Final resolution on this matter and controversy has been settled by and between the parties, and accepted by the Court, as reflected herein.

IT IS ORDERED AND ADJUDGED AS FOLLOWS:

1. The parties have conferred and desire to resolve this matter without protracted litigation and to resolve Mr. Woodhouse's claims without the necessity of a trial by entering into this Consent Order.
2. Defendants and their officers, agents, services, employees, attorneys and other persons who are in active concert with them, not including Riverfest Inc., or its employees, agents or affiliates, are permanently ENJOINED from restricting Plaintiff's speech and literature distribution during the Riverfest events that are free and open to the public at Riverside Park.
3. Without conceding liability, Defendants shall pay Plaintiff the amount of \$1.00 in nominal damages. Without conceding that Plaintiff is a prevailing party, Defendants shall also pay fees, expenses and litigation costs to Plaintiff's attorneys in the amount of \$_____ within 45 days of the date of this order. Payment of \$_____ shall be made in trust to Plaintiff's attorneys.
4. This action be, and is hereby, DISMISSED without prejudice and without further costs or fees to any party (other than that payment identified in the preceding paragraph). The Court retains jurisdiction of this case solely: a) to enforce the payment of the amount enumerated in the third paragraph; and b) to enforce the

second paragraph of this consent judgment, and the “without prejudice” language shall not allow the parties to relitigate issues raised in this matter.

Entered this ____ day of _____, 2013.

BY THE COURT:

BARBARA B. CRABB
District Judge

WE HEREBY CONSENT TO THE FORM
AND ENTRY OF THE ABOVE ORDER:

/s/ Nathan Kellum NATHAN W. KELLUM TN Bar No. 13482: MS Bar No. 8819 Center for Religious Expression 699 Oakleaf Office Lane, Suite 107 Memphis, TN 38117 (901) 684-5485 – Telephone (901) 684-5499 – Facsimile nkellum@crelaw.org Attorney for Plaintiff	/s/ Julie P. Wilson JULIE P. WILSON WI Bar No. 1034792 Crivello Carlson, S.C. 710 N. Plankinton Ave., Suite 500 Milwaukee, WI 53203 (414) 271-7722 – Telephone (414) 271-4438 – Facsimile jwilson@crivellocarlson.com Attorney for Defendants
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