IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 1:22-cv-02544-DDD-SBP

Equal Employment Opportunity Commission,

Plaintiff,

Ravinder Singh and Inder Dhanota,

Plaintiff-Intervenors,

v.

Global Medical Response, Inc., *et al.*,

Defendants.

JOINT MOTION FOR ENTRY OF CONSENT DECREE

The Parties, through their respective counsel and pursuant to D.C.COLO.LCivR. 41.2, jointly move for entry of the Consent Decree, filed as Exhibit "A" to this motion, and for administrative closure, subject to the terms of the Consent Decree. As grounds for this motion, the Parties state as follows:

1. The Consent Decree has been signed by all parties.

2. The Parties believe that all issues in this case are resolved by the Consent Decree, including all the Equal Employment Opportunity Commission's claims for monetary, injunctive, and equitable relief.

3. The Parties stipulate that this Consent Decree is fair, reasonable, and equitable; is not a product of collusion; and does not violate the public interest. The Consent Decree was achieved after arms-length negotiations between the Parties.

4. The Parties have reached agreement on the monetary and non-monetary terms included in the Consent Decree.

5. Each Party shall bear its own attorney fees and costs.

6. Upon entry of the Consent Decree as an Order of the Court, the Parties move for the administrative closure of this case pursuant to D.C.COLO.LCivR 41.2, subject to the terms of the Consent Decree, which include this Court retaining jurisdiction during the three-year term of the Consent Decree.

WHEREFORE, the Parties respectfully request that the Court sign and enter the Consent Decree, filed concurrently herewith, and administratively close the present action following entry and subject to the terms of the Consent Decree.

Respectfully submitted this 3rd day of November 2026.

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

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CERTIFICATE OF SERVICE (CM/ECF)

I hereby certify that on November 3, 2026, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will electronically serve all attorneys of record. Under D.C.COLO.LCivR 5.1(d), "[t]he Notice of Electronic Filing (NEF) generated by CM/ECF constitutes a certificate of service."

s/*Steven A. Wagner*
Attorney for Plaintiff EEOC