

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

GRACEHAVEN, INC.,

Plaintiff,

v.

**MONTGOMERY COUNTY
DEPARTMENT OF JOB AND FAMILY
SERVICES; MICHELLE NIEDERMIER,**
in her official capacity as the Director of the
Montgomery County Department of Job and
Family Services; **BRYNN McGRATH,** in
her official capacity as the Associate
Director of the Montgomery County
Department of Job and Family Services; and
JUDY DODGE, MARY McDONALD, and
CAROLYN RICE, in their official
capacities as the Montgomery County Board
of Commissioners,

Defendants.

Case No. 3:24-cv-00325-MJN-CHG

Judge Michael J. Newman
Magistrate Judge Caroline H. Gentry

STIPULATION OF DISMISSAL

Plaintiff Gracehaven, Inc. and Defendants Montgomery County Department of Job and Family Services, Michelle Niedermier, Brynn McGrath, and Montgomery County Commissioners Judy Dodge, Mary McDonald, and Carolyn Rice (collectively, “Parties”), stipulate to dismiss this case pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii). The dismissal is with prejudice. The Parties have voluntarily resolved all claims and issues in this proceeding through a settlement agreement.

The Parties mutually agree that this Court shall retain jurisdiction to enforce the terms of the settlement agreement and thus request that the Court retain such jurisdiction by entering a dismissal entry stating that the Court retains jurisdiction to enforce the Parties’ settlement agreement. *See Kokkonen v. Guardian Life Ins. Co. of Am.*, 511 U.S. 375, 381 (1994) (court can retain jurisdiction over enforcement of settlement agreement by stating so in dismissal entry).

Dated: April 22, 2026

MATHIAS H. HECK, JR.
PROSECUTING ATTORNEY

By: Ward C. Barrentine (per email approval 4/22/26)

Ward C. Barrentine, (#0074366)
Anu-Pama Sharma, (0081773)
Assistant Prosecuting Attorney
301 West Third Street
P.O. Box 972
Dayton, Ohio 45422
Telephone: (937) 225-5795
Fax Number: (937) 225-4822
E-mail: barrentinw@mcoho.org
sharmaa@mcoho.org

Attorneys for Defendants

s/ Jacob E. Reed

Jacob E. Reed
OH Bar No. 99020
Trial Attorney

ALLIANCE DEFENDING FREEDOM
44180 Riverside Parkway
Lansdowne, VA 20176
Telephone: (571) 707-4655
jreed@ADFLegal.org

Ryan J. Tucker*
AZ Bar No. 034382
Jeremiah J. Galus*
AZ Bar No. 030469
ALLIANCE DEFENDING FREEDOM
15100 N. 90th Street
Scottsdale, AZ 85260
Telephone: (480) 444-0020
rtucker@ADFLegal.org
jgalus@ADFLegal.org

David A. Cortman*
GA Bar. No. 188810
ALLIANCE DEFENDING FREEDOM
1000 Hurricane Shoals Road, NE
Suite D-1100
Lawrenceville, GA 30043
Telephone: (770) 339-0774
dcortman@ADFLegal.org

Attorneys for Plaintiff
* Admitted *pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2026, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will serve all counsel of record.

s/Jacob E. Reed
Jacob E. Reed
Attorney for Plaintiff