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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA,

Plaintiff,

v.

LAKELAND BANK,

Defendant.

Civil Action No. 2:22-cv-5746-CCC

**UNOPPOSED MOTION AND MEMORANDUM IN SUPPORT TO
TERMINATE CONSENT ORDER AND DISMISS WITH PREJUDICE**

Plaintiff United States of America (“United States”), by and through undersigned counsel, files this unopposed motion to provide the Court with a status update and to respectfully request termination of the Consent Order and dismissal of this case with prejudice.

The Court entered a Consent Order in this case on September 29, 2022 (Doc. 4). The Consent Order states that its requirements will remain in effect for five years, or longer if Lakeland Bank has not invested all money in the loan subsidy fund. (*Id.* ¶ 51). The Consent Order also states that other modifications may be made upon approval of the Court, by motion by any Party, and that the Parties will work cooperatively to discuss and attempt to agree to proposed modifications if there are changes in material factual circumstances. (*Id.* ¶ 54).

In support of this motion, the United States advises the Court that Lakeland Bank has demonstrated a commitment to remediation and has reached substantial compliance with the monetary and injunctive terms of the Consent Order.¹ Lakeland has also committed to continuing its disbursement of the loan subsidy fund (*Id.* ¶ 23-26) and to provide the United States confirmation of that disbursement upon completion.

The United States has conferred with Lakeland Bank, which does not oppose this motion.

WHEREFORE, for these reasons, Plaintiff United States respectfully requests that the Court enter the attached Proposed Order terminating the Consent Order and dismissing this case with prejudice.

¹ On May 16, 2024, Provident Bank acquired Lakeland Bank and is the successor entity that assumed the responsibility for the requirements of the Consent Order. (*Id.* ¶¶ 57, 60).

Respectfully submitted this 28th day of May, 2025.

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CERTIFICATE OF SERVICE

I hereby certify that on May 28, 2025, I electronically filed the foregoing via CM/ECF, causing a copy to be sent to all counsel of record.

/s/ Marta Campos

Marta Campos
Counsel for United States