



60 days, and, thus, move to stay all deadlines by and between Plaintiffs and Defendant for the next 60 days.

WHEREFORE, PREMISES CONSIDERED, the parties pray that the Court stay all deadlines in this case by and between them as set forth above, and for all other relief to which they are justly entitled.

Dated: December 19, 2024

Respectfully submitted,

/s/ Jay D. Ellwanger

Jay D. Ellwanger  
Texas State Bar No. 24036522  
jellwanger@equalrights.law  
David W. Henderson  
Texas State Bar No. 24032292  
dhenderson@equalrights.law  
Jasmine E. Isokpunwu  
Texas State Bar. No. 24128292  
jisokpunwu@equalrights.law  
Ellwanger Henderson LLLP  
400 South Zang Blvd, Suite 600  
Dallas, Texas 75208  
Telephone: (737) 808-2260  
Facsimile: (737) 808-2239

James A. Vagnini  
N.Y. State Bar No. 2958130  
*Admitted pro hac vice*  
jvagnini@vkvlawyers.com  
Valli Kane & Vagnini LLP  
600 Old Country Road, Suite 519  
Garden City, New York 11530  
Telephone: (516) 203-7180  
Facsimile: (516) 706-0248

**COUNSEL FOR PLAINTIFFS**

JOHN CREUZOT  
CRIMINAL DISTRICT ATTORNEY  
DALLAS COUNTY, TEXAS

/s/ Jason G. Schuette [ with permission ]

Assistant District Attorney  
Texas State Bar No. 17827020  
[jason.schuette@dallascounty.org](mailto:jason.schuette@dallascounty.org)  
Joseph W. Spence  
Assistant District Attorney  
Texas State Bar No. 18913500  
[joseph.spence@dallascounty.org](mailto:joseph.spence@dallascounty.org)

Civil Division  
Dallas County Records Building  
500 Elm Street, Suite 6300  
Dallas, Texas 75202  
Telephone: 214.653.7358  
Telecopier: 214.653.6134

**COUNSEL FOR DEFENDANT,  
DALLAS COUNTY, D/B/A DALLAS  
COUNTY SHERIFF'S  
DEPARTMENT**

**CERTIFICATE OF SERVICE**

I hereby certify that on December 19, 2024, a true and correct copy of the above and foregoing document was served on all counsel of record via the Court's ECF system.

/s/ Jay D. Ellwanger  
Jay D. Ellwanger