UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

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§	CIVIL ACTION NO. 3:20-cv-00313
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#### JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiffs, Felesia Hamilton, Tashara Caldwell, Brenda Johnson, Arrisha Knight, Jamesina Robinson, Debbie Stoxstell, Felicia Smith, Tameka Anderson-Jackson, and Tammy Island, and Defendant, Dallas County d/b/a Dallas County Sheriff's Department, jointly notify the Court that Plaintiffs and Defendant have reached an agreement in principle to settle the above-referenced litigation.

The parties anticipate that the Dallas County Commissioner's Court will hold a vote to approve the settlement agreement in January, 2025 and that once the terms and conditions of that settlement agreement are fulfilled, the parties will jointly move to dismiss the actions with prejudice.¹ The parties anticipate that such dismissal will be filed within

¹ On December 29, 2023, the Court entered an Order of Consolidation pursuant to Fed. R. Civ. P. 42(a), consolidating Civil Action No. 3:20-CV-1410-N (lead case) with *Stoxstell et al. v. Dallas County*, No. 3:23-CV-1410-N. *See* ECF No. 33. The anticipated settlement would dispose of all claims in both cases.

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,

<u>/s/ Jay D. Ellwanger</u> 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 Joseph W. Spence Assistant District Attorney Texas State Bar No. 18913500 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.

<u>/s/ Jay D. Ellwanger</u> Jay D. Ellwanger