

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 20-21553-Civ-COOKE/GOODMAN

PATRICK GAYLE, et al.,

Petitioners-Plaintiffs, on behalf of
themselves and those similarly situated,

v.

MICHAEL W. MEADE, et al.,

Respondents-Defendants.

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**JOINT NOTICE OF PROPOSED SETTLEMENT, MOTION TO SUSPEND ALL
PRETRIAL DEADLINES, MOTION TO SUSPEND THE CALENDAR CALL, AND
MOTION TO SUSPEND THE TRIAL DATE**

Under Local Rule 16.4, Plaintiffs, by and through their undersigned counsel, and Defendants, by and through their undersigned Assistant U.S. Attorneys, hereby notify the Court that they have reached a proposed settlement of the claims in this case. Defendants are filing a motion to seek leave of the Court to file the proposed Settlement Agreement under Seal, contemporaneous with the filing of this Notice.

The proposed settlement is to result in a final proposed injunctive order, which will require the Court's approval. The parties are currently preparing a final proposed injunctive order that implements the terms of the settlement agreement and is consistent with Federal Rule of Civil Procedure 65(d). They are also preparing class notice and are preparing to move the Court to schedule a fairness hearing, as required by Federal Rule of Civil Procedure 23(e).

Given the approaching April 27, 2021 trial date, the parties are notifying the Court of their proposed agreement now. The parties also move jointly to suspend (1) the pretrial

deadlines, (2) the Calendar Call, and (3) the trial date in this case. The parties believe this will facilitate the final settlement of this case.

Date: April 13, 2021

Respectfully Submitted,

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ACTING UNITED STATES ATTORNEY

/s/ Natalie Diaz

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