

**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.

**DEFENDANTS' UNOPPOSED MOTION TO FILE PROPOSED
SETTLEMENT AGREEMENT UNDER SEAL**

Defendants, by and through their undersigned counsel, file their Unopposed Motion to File Proposed Settlement Agreement under Seal under S.D.Fla.L.R. 5.4, and states:

1. The parties have reached a proposed settlement of all claims in the instant litigation. Because the defendants are officials of the United States Immigration and Customs Enforcement (ICE), and the Attorney General of the United States, the proposed settlement requires final approval by ICE Headquarters in Washington, D.C., as well as the Department of Justice in Washington, D.C.

2. Trial is scheduled to commence in this case on April 27, 2021, and there are a number of pretrial deadlines rapidly approaching. The parties are filing a Joint Notice to the Court regarding the proposed settlement, and seeking suspension of the pretrial deadlines, the calendar call, and the trial date. The parties wish to provide the Court with the proposed Settlement Agreement, to consider along with the parties' joint motion.

3. Because the proposed Settlement Agreement requires approval at the

headquarters level for defendants, before it is a final agreement, defendants seek to file the proposed Settlement Agreement under seal. The terms in the proposed Settlement Agreement, because they are not final, constitute a compromise offer under Fed.R.Evid. 408, and should remain confidential. Once the proposed Settlement Agreement is reviewed by ICE Headquarters and the Department of Justice, and final approval is granted, the Settlement Agreement can be made public.

4. Defendants have conferred with plaintiffs' regarding the instant motion. Plaintiffs do not object to the motion to seal the proposed Settlement Agreement.

WHEREFORE, defendants respectfully request leave of the Court to file the proposed Settlement Agreement under seal.

DATED: April 13, 2021

Respectfully submitted,

JUAN ANTONIO GONZALEZ
ACTING UNITED STATES ATTORNEY

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 13, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF.

s/ Dexter A. Lee
DEXTER A. LEE
Assistant U.S. Attorney