

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION**

DAVID B. MEANS, ET AL.

CIVIL ACTION NO. 5:23-cv-00669

VERSUS

JUDGE DAVID C. JOSEPH

DESOTO PARISH, ET AL.

MAGISTRATE JUDGE HORNSBY

JOINT MOTION TO STAY PENDING SETTLEMENT NEGOTIATIONS

Plaintiffs¹, and Defendants Desoto Parish and the DeSoto Parish Police Jury, through undersigned counsel, file this joint motion to stay the case pending settlement negotiations.

As the parties informed the Court in their April 5 Joint Status Report, settlement negotiations between the parties remain ongoing, including determining whether mediation might be helpful for resolving this case. At the March 18, 2024 Status Conference, the Court noted its support of these efforts, and indicated that the parties should ask if they need additional time to conduct such negotiations.

Accordingly, due to approaching expert report and discovery deadlines, the parties need more time to focus on further negotiations, including an opportunity to continue devoting their time and resources toward a potential settlement that may resolve all claims in this action. The parties also note that the next Police Jury election is currently not scheduled until October 9, 2027; thus, even if staying the case ultimately causes the currently scheduled trial date to be moved, the parties agree there will still be more than enough time to fully litigate this case if necessary once settlement talks conclude. The parties therefore jointly request that the Court hold this case in

¹ Plaintiffs in this matter are David B. Means, Ryan Dupree, Robert G. Burford, Robert Gross, Mary L. Salley, Martha Trisler, John F. Pearce, Joe Cobb, Jack L. Burford, Jack E. Barron, W. Bruce Garlington, Donald Barber, Billy Dwayne Brumley, and Sherry Brumley.

abeyance, including any presently unexpired deadlines under the current Scheduling Order,² pending the conclusion of settlement negotiations.

Furthermore, in line with the parties' April 5 Joint Status Report, the parties request that the Court allow for submitting another status report to the Court on or before April 30, 2024, to inform the Court on the progress of settlement and whether mediation might be beneficial, as well as subsequent status reports every thirty (30) days thereafter as needed until the conclusion of settlement negotiations.

WHEREFORE, the parties respectfully request that this Court grant this Motion and enter an order holding the case in abeyance, and stay all presently unexpired Scheduling Order deadlines pending the conclusion of settlement negotiations.

Dated: April 10, 2024

RESPECTFULLY SUBMITTED:

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² To be clear, the parties' request includes that the Court stay upcoming expert report deadlines for both Plaintiffs (scheduled for April 15, 2024) and Defendants (scheduled for May 15, 2024). Should the Court deny this Joint Motion to Stay, the parties move in the alternative that the Court stay each of the deadlines contained in the January 31, 2024 Order, (Doc. 73), for an additional 30 days to avoid prejudice to the parties' cases.

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CERTIFICATE OF SERVICE

I hereby certify that on April 10, 2024, I served the foregoing via email on all counsel of record by operation of the Court's CM/ECF filing system.

/s/ Reid A. Jones
Reid A. Jones

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[PROPOSED] ORDER

Considering the parties' Joint Motion to Stay Pending Settlement Negotiations;

IT IS ORDERED that the Motion is GRANTED and all pending deadlines are hereby stayed pending the conclusion of settlement negotiations;

IT IS FURTHER ORDERED that the parties shall submit another status report to the Court on or before April 30, 2024, to inform the Court regarding the progress of settlement and whether mediation might be beneficial, as well as subsequent status reports every thirty (30) days thereafter as necessary; and

IT IS FURTHER ORDERED, that upon conclusion of settlement negotiations, the parties shall immediately notify the Court regarding the outcome, including submission of a new proposed scheduling order if necessary.

THUS DONE AND SIGNED on _____, 2024, in Shreveport, Louisiana.

**MAGISTRATE JUDGE MARK L. HORNSBY
WESTERN DISTRICT OF LOUISIANA**