

**IN THE SUPREME COURT OF OHIO**

State of Ohio, *ex rel.*, Steve R. Maddox., *et al.*,  
Relators,  
v.  
Village of Lincoln Heights, Ohio, *et al.*,  
Respondents.

Case No.: 14-1267

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**JOINT MOTION FOR STAY OF BRIEFING SCHEDULE AND FOR EXPEDITED RULING ON JOINT MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

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Relators Steve R. Maddox, Antwan L. Sparks, Vernon Jeffers, Michael Lowe, Aaron Smith, Onam Williams, Roger Reynolds, Henry Dawkins and Moniqua White (“Relators”) and Respondents The Village of Lincoln Heights, Ohio, Mayor Laverne Mitchell, Stephanie Summerow Dumas, Councilwoman Deborah Seay, Councilman Harold Stewart, Councilwoman Sharon Wills, Clerk of Council Ayrica Raglin, Councilman Richard Headon, Councilwoman Jetta-Chiles, Councilwoman Stevenson, and Councilman Willis (“Respondents”) (collectively “the Parties”) jointly move this Court to stay its October 7, 2015 decision returning this case to the regular docket and setting a briefing schedule. (10/7/15 Entry, p. 1).

On March 16, 2015, the Parties filed a Joint Motion for Referral to Mediation and to Stay Proceedings under S.Ct.Prac.R. 19.01, which was granted on March 24, 2015. On May 20, 2015, the Parties participated in their second full-day mediation. Through that mediation and extended post-mediation negotiations, the Parties reach a settlement. On October 2, 2015, the Parties attempted to file their Joint Motion for Preliminary Approval of Class Action Settlement, which included the Settlement Agreement and various other notices and forms as Exhibits 1 and

2, but that filing was rejected because the Court's March 24, 2015 stay Order was still in place. After notifying the mediator, the Court placed this case back on the active docket on October 7, 2015 and issued a schedule for briefing and the presentation of evidence. That same day, on October 7, 2015, the Parties filed their Joint Motion for Preliminary Approval of Class Action Settlement.

Because the Parties reached a settlement, the Parties have moved for preliminary approval of that settlement, and Relators' deadline to file their brief and evidence is currently October 17, 2015, the Parties move for an Order staying the briefing and presentation of evidence schedule and for an expedited decision on their Joint Motion for Preliminary Approval of Class Action Settlement.

Respectfully submitted,

/s/ Hans Nilges per authority 10/13/15

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served upon the following via email on October 13, 2015:

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