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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF ARIZONA**

C.M., on her own behalf and on behalf of her  
minor child, B.M.; L.G., on her own behalf  
and on behalf of her minor child, B.G.; M.R.,  
on her own behalf and on behalf of her minor  
child, J.R.; O.A., on her own behalf and on  
behalf of her minor child, L.A.; and V.C., on  
her own behalf and on behalf of her minor  
child, G.A.,

Plaintiffs,

v.

United States of America,

Defendant.

No. 2:19-cv-05217-SRB

**JOINT NOTICE OF CONDITIONAL  
SETTLEMENT AND STIPULATION  
TO STAY LITIGATION  
DEADLINES**

1 Plaintiffs and Defendant (“Parties”), by and through undersigned counsel, hereby  
2 notify the Court that the Parties have reached conditional settlements in this action under  
3 the Federal Tort Claims Act, 28 U.S.C. § 2671, et seq. The Parties stipulate and request  
4 that all deadlines in the Court’s Order dated December 14, 2023 (ECF No. 439) be vacated  
5 and the action be stayed based on the following:

6 1. The Parties have reached conditional settlements of all claims in this  
7 litigation, subject to finalizing written settlement agreements and obtaining court  
8 approval of the settlements of the minors’ claims, to be followed by the approval of the  
9 proposed settlements by the Attorney General’s designee.

10 2. Plaintiffs intend to file a motion for approval of the settlements of the  
11 minors’ claims as soon as possible after the written settlement agreements are finalized.

12 3. Absent a stay pending finalization of the settlements, litigation burden and  
13 expense will be incurred that are to be made unnecessary by the pending settlements.

14 4. The Parties stipulate to file a joint status report every 60 days during the  
15 stay to keep the Court apprised of the progress of finalizing the pending settlements. It is  
16 anticipated that, once the settlements are finalized, the Parties will file a stipulation for  
17 dismissal of all claims.

18 Therefore, in the interest of judicial economy and efficiency, and to preserve the  
19 benefit of the pending settlements, the Parties request that the Court enter the attached  
20 order vacating all deadlines in the Court’s Order dated December 14, 2023 (ECF No. 439)  
21 and staying this action pending further stipulation or motion of the Parties or Order of the  
22 Court.

23 Respectfully submitted this 10th day of April, 2024.

24 OSBORN MALEDON, P.A.

25 By /s/ BriAnne Illich Meeds

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