

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

TONYA CLAY, et al.)	CASE NO. 1:18-CV-02929
)	
Plaintiffs,)	JUDGE SOLOMON OLIVER
)	
vs.)	
)	
CUYAHOGA COUNTY, Ohio et al.,)	
)	
Defendants.)	

JOINT NOTICE OF SETTLEMENT AGREEMENT STATUS

The parties jointly file this status report with the Court concerning the status of settlement negotiations. The parties have not reached a final settlement of the case. The parties agreed that the County Defendants and Plaintiffs would address the non-medical issues first. Regarding the non-medical issues, the County Defendants and Plaintiff's counsel have reached an agreement on how to proceed towards a possible settlement.

As part of the agreement, the County Defendants and Plaintiffs retained a joint expert to assist in identifying corrective measures, if any, for the Cuyahoga County Corrections Center ("CCCC"). The joint expert, however, has been limited to document review due to the Covid-19 pandemic. He has engaged in extensive review of such documents and jail policies. The next step is for the expert to conduct an onsite inspection of the CCCC and meet with jail personnel. Due to the recent surge in

Covid-19 cases in Cuyahoga County and throughout the country, the joint expert is presently unable to conduct a site inspection. But the parties are hopeful that the joint expert will be able to conduct this inspection in March or April of this year.

Although this process is taking longer than anticipated (due mostly to circumstanced beyond the parties' control) the parties remain committed to working cooperatively towards a resolution.

Respectfully submitted,

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