

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

TONYA CLAY, et al.,

Plaintiffs,

-vs-

CUYAHOGA COUNTY, et al.,

Defendants.

Case No. 1:18 CV 2929

Judge Solomon Oliver, Jr.

JOINT STATUS REPORT CONCERNING SETTLEMENT NEGOTIATIONS PROCESS

In response to the Court's July 26, 2021 Order, the Parties jointly file this status report with the Court concerning the status of settlement negotiations.

The Parties have not yet reached a final settlement of the case. The Parties previously agreed that the County Defendants and Plaintiffs would first address issues pertaining to the correctional staff and operation of the Cuyahoga County Corrections Center ("CCCC"), and would subsequently address issues pertaining to provision of medical and mental health care within the CCCC. Following the Parties' January 8, 2021 status report (Dkt. 50), the County Defendants and Plaintiffs have continued to work with their jointly-designated expert, Martin Horn, to identify corrective measures for the CCCC. Mr. Horn's work has been affected by the Covid-19 pandemic, as the repeated surges in COVID-19 cases prevented onsite inspections

for several months. To date, Mr. Horn has engaged in extensive review of documents and CCCC policies and is scheduled for an onsite inspection in November 2021.

After Mr. Horn's onsite inspection, the Parties will be in a position to provide the Court with further information concerning the timeline and remaining necessary steps for potential resolution of correctional practices and operations aspects of this case, and to provide further updates concerning the Parties' positions concerning how to address claims concerning medical and mental health care provision.

Though this process has continued to take longer than anticipated, particularly due to the ongoing COVID-19 pandemic, the parties remain committed to working cooperatively toward a resolution. The Parties ask that the Court continue to hold all deadlines concerning disclosure of witnesses and other dates related to the preliminary injunction schedule applicable to all parties in abeyance, pending the Parties' ongoing efforts toward potential resolution.

Respectfully submitted,

/s/Jacqueline Greene

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CERTIFICATE OF SERVICE

I hereby certify that on August 25, 2021, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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