

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

JOHN DOE 1, a minor, by and through his parent and natural guardian JANE DOE 1; JOHN DOE 2, a minor, by and through his parent and natural guardian JANE DOE 2; on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

NORTH CAROLINA DEPARTMENT OF PUBLIC SAFETY; JEFFREY SMYTHE, Secretary of the North Carolina Department of Public Safety, in his official capacity; WILLIAM L. LASSITER, Deputy Secretary of the Division of Juvenile Justice and Delinquency Prevention, in his official capacity; TIEA DANIELS, Facility Director of the Cabarrus Regional Juvenile Detention Center, in her official capacity,

Defendants.

No. 1:24-CV-00017-CCE-JGM

NOTICE OF SETTLEMENT

L.R. Civ. 83.3

Pursuant to Local Rule 83.3 of the Local Rules of this Court, the Parties hereby notify the Court that they have reached a settlement in principle, that, if finalized, will resolve the claims at issue in this action.

Because this matter involves a certified class of minors and prospective relief governed by the Prison Litigation Reform Act, Court review and approval of the settlement will be required. *See* Fed. R. Civ. P. 23(e); LR17.1(e); 18 U.S.C. § 3626.

The Parties are preparing the settlement documentation and respectfully request that the Court suspend applicable deadlines for a reasonable period to allow completion of the settlement and submission of appropriate approval materials.

The Parties will file a motion for approval or a status report within 45 days.

Respectfully submitted this the 26th day of February 2026.

JEFF JACKSON
ATTORNEY GENERAL

/s/ Elizabeth Curran O'Brien
Elizabeth Curran O'Brien
Special Deputy Attorney General
State Bar No. 28885
eobrien@ncdoj.gov

Laura H. McHenry
Special Deputy Attorney General
State Bar No. 45005
lmchenry@ncdoj.gov

Terence Steed
Special Deputy Attorney General
State Bar No. 52809
tsteed@ncdoj.gov

North Carolina Department of Justice
P.O. Box 629
Raleigh, North Carolina 27602
Phone: 919-716-6900
Fax: 919-716-6763
Attorneys for Defendants

**NELSON MULLINS RILEY &
SCARBOROUGH LLP**

/s/ Robert L. Lindholm

Robert L. Lindholm (N.C. Bar No. 52800)
301 South College Street
23rd Floor
Charlotte, NC 28202
(704) 417-3000
robert.lindholm@nelsonmullins.com

Donna O. Tillis*
Soren K. Young*
Yasmeen Ebbini*
Axton D. Crolley*
1320 Main Street, 17th Floor
Columbia, SC 29201
(803) 799-2000
donna.tillis@nelsonmullins.com
soren.young@nelsonmullins.com
yasmeen.ebbini@nelsonmullins.com
axton.crolley@nelsonmullins.com

Matthew G. Lindenbaum*
One Financial Center, Suite 3500
Boston, MA 02111
(617) 217-4700
matthew.lindenbaum@nelsonmullins.com

**The Law Office of Michelle Duprey,
PLLC**

Michelle Duprey (N.C. Bar No. 53205)*
720 E. 4th Street, Suite 300
Charlotte, NC 28202
(336) 685-1647
michelledupreylaw@icloud.com

**Special Appearance Pursuant to Local
Civil Rule 83.1(d)*

Attorneys for Plaintiffs