

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

KAYA HUDGINS,

Plaintiff,

v.

**BOARD OF EDUCATION OF THE
CITY OF CHICAGO, et al.,**

Defendants

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Case No. 1:23-cv-00218

Hon. Matthew F. Kennelly

Hon. Mag. Heather McShain

JOINT STATUS REPORT

Counsel for Plaintiff Kaya Hudgins (“Plaintiff”) and Defendants Board of Education of the City of Chicago (the “Board”) and The David Lynch Foundation (“DLF”) (together, “Defendants”) submit the following Joint Status Report in compliance with the Court’s Order dated December, 17, 2024. (Dkt. 226).

1. After meeting and conferring further on December 20 and December 24, 2024, counsel have reached agreement regarding the issues pertaining to the wording of the draft Settlement Agreement that were raised at the hearing on December 17, 2024, and a final draft of the Agreement has been circulated for review and discussion, which all parties will be providing to their clients. At this time, counsel anticipate having a signed Agreement no later than Jan. 10, 2025.¹

¹ Plaintiff’s counsel has indicated their intention of negotiating an additional term after the filing of this Joint Status Report as it relates to Ms. Hudgins’ remedies in the event that one or both Defendants breach the Settlement Agreement.

2. Counsel is working on finalizing agreement on the Joint Motion for Preliminary Approval of the Class Action Settlement, the Memorandum in Support of the Joint Motion for Preliminary Approval of the Class Action Settlement, the Notice of Class Action Settlement to the Class Members, along with the Claim Form and Exclusion Form. Plaintiff anticipates (and the defendants will endeavor to cooperate in meeting this deadline) to file the Joint Motion for Preliminary Approval of the Class Action Settlement, with exhibits, and the Memorandum in Support of the Joint Motion for Preliminary Approval of the Class Action Settlement no later than Jan. 13, 2025.
3. Upon entry of a Preliminary Approval Order, Notice of the Class Action Settlement and Claim Forms will be sent out to all Class Members by the Class Administrator within 21 days thereafter.

Respectfully submitted,

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