

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

JOSEPH GALLOWAY, individually, §

DANA BROCKWAY, as next friend of her §  
minor child, A.B., on behalf of all those §  
similarly situated, §

GLORIA WASHINGTON, as next friend of §  
her minor child, J.W., on behalf of all those §  
similarly situated, §

LINDA THOMAS, as next friend of J.A., on §  
behalf of all those similarly situated, §

V. §

CIVIL ACTION NO. 07-CA-276-LY

TEXAS YOUTH COMMISSION, §  
RICHARD NEDLEKOFF, in his official §  
capacity as Conservator of the Texas Youth §  
Commission, ALEXANDRA WARMKE, §  
MARY HENRY, as Executor of the Estate §  
of James Henry, JOHN WILLIAMS, §  
BRADLEY SHACKLEFORD, §  
CHRISTOPHER TREVIÑO, MANUEL §  
TORRES, RICHARD BRIGGS, PHILIP §  
WATSON, ROBERT McQUEEN, DON §  
BRANTLEY, LINDA REYES, DWIGHT §  
HARRIS, BART CALDWELL, JOYCE §  
McDANIELS, TERI WILSON, GERALDO §  
PENUELAS, EDUARDO MARTINEZ, §  
JEROME WILLIAMS, BELYNDA §  
BENNETT, ALAN WALTERS, SHIREE N. §  
WOODEN, JACQUELINE LEWIS, §  
FRANK SOTO, SHIRLEY BUSH, DON §  
FREEMAN, BLU NICHOLSON, JEROME §  
PARSEE, LYDIA BERNARD, CHESTER §  
CLAY, KERRI DAVIDSON, JUAN S. §  
MUÑOZ, DON BETHEL, STEVE FRYAR, §  
PATSY REED GUEST, BILL MAHOMES, §  
JR., GOGI DICKSON and ROSS §  
ROBINSON, Individually §

**NOTICE OF SETTLEMENT, AND JOINT MOTION OF ALL PLAINTIFFS AND  
DEFENDANT TEXAS YOUTH COMMISSION TO REMOVE PENDING DEADLINE,  
EXTEND THE STAY, AND SCHEDULE STATUS CONFERENCE**

COME NOW all Plaintiffs and Defendant Texas Youth Commission (“TYC”), and respectfully show as follows:

The parties have reached a complete settlement of this case at mediation. The settlement is subject to the approval of the Governor’s Office and the Comptroller’s Office. The parties anticipate that the settlement will likely take approximately 120 days to be approved and funded by the State of Texas. Once the settlement funds are made available to Plaintiffs, this lawsuit will be dismissed as to all Defendants. Because one or more of the Plaintiffs are minors appearing through a “next friend,” the settlement will require the approval of this Court.

The Defendants currently have a deadline of April 17, 2008 for filing their answers or motions to dismiss in response to the Plaintiffs’ Third Amended Complaint. In light of the settlement, all parties agree that no resources should be expended in preparing these pleadings. The parties therefore respectfully request that the Court remove the April 17, 2008 deadline and that the Court extend the stay currently in effect for this case until further order of the Court.

The parties also respectfully request that the Court schedule a status conference in approximately 120 days (i.e., early August) so that the parties can either present dismissal papers or apprise the Court of the status of finalizing the settlement.

The parties have conferred with counsel for all other Defendants, and the relief requested in this Motion is unopposed.

[SIGNATURE BLOCK TO FOLLOW ON NEXT PAGE]

Respectfully submitted,

 (by  with permission)

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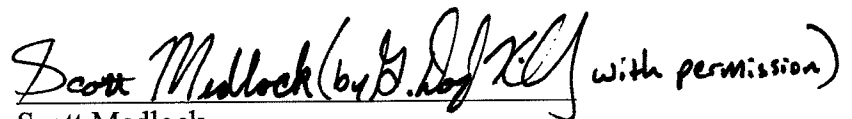
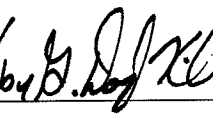
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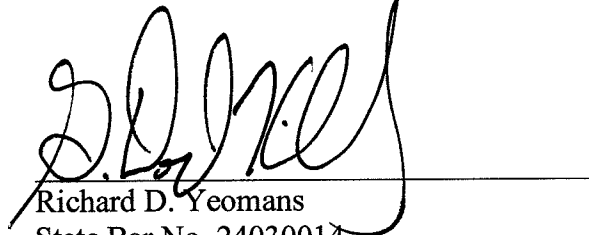
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GOGI DICKSON, AND RICHARD NEDELKOFF*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 11<sup>th</sup> day of April, 2008, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

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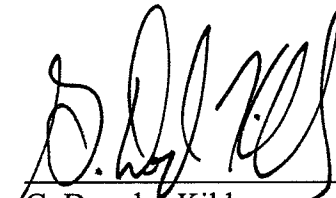
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