

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CONSOLIDATED ACTION

Case No. 18-62758-CIV-DIMITROULEAS
(Consolidated cases)

IN RE: MARJORY STONEMAN DOUGLAS
HIGH SCHOOL SHOOTING FTCA LITIGATION

**JOINT NOTICE OF AGREEMENT TO SETTLE AND MOTION TO STAY
PROCEEDINGS**

Pursuant to Local Rule 16.4, the parties hereby advise the Court that they have reached an agreement to settle all of the claims at issue in these consolidated actions. With the consent of all plaintiffs in this consolidated action and consistent with this Court's order appointing Kristina Infante as Lead Counsel, she and other members of the Podhurst Orseck law firm, successfully negotiated a global settlement with the Department of Justice. The parties are presently working to finalize additional details before submission for final approval by the appropriate Department of Justice official. Once those details are finalized and approval is granted, the plaintiffs will ask that the Court dismiss these actions in their entirety. In the meantime, the parties respectfully request a stay of all pending deadlines and hearings.

Dated: November 22, 2021

Respectfully submitted,

By: /s/ Kristina M. Infante
Kristina M. Infante
FL Bar No: 112557
Plaintiffs' Lead Counsel
PODHURST ORSECK P.A.

/s/ Paul David Stern
PAUL DAVID STERN

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