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8		The Honorable John C. Coughenour The Honorable Michelle L. Peterson	
9	UNITED STATES DISTRICT COURT		
10	WESTERN DISTRICT OF WASHINGTON AT SEATTLE		
11	JAMES MOSELEY,	NO. C20-1311-JCC-MLP	
12	Plaintiff,	NOTICE OF SETTI EMENT	
13	v.	NOTICE OF SETTLEMENT WITH REQUEST FOR TIME TO FILE STIPULATED DISMISSAL	
14	STATE OF WASHINGTON, et al.,	AND [PROPOSED] ORDER	
15	Defendants.		
16	TO: JAMES MOSELEY, Plaintiff		
17	TO: DARRYL PARKER, Plaintiff's Attorney		
18	•		
19	TO: CLERK OF THE COURT PLEASE TAKE NOTICE that the parties to the above-reference matter have reached a		
20	SETTLEMENT of all claims that will fully resolve this matter.		
21	The parties request the Court strike the trial date and all related dates and allow the parties		
22	to file a Stipulated Motion for Dismissal by April 25, 2024. The parties understand that, should		
23	they fail to file a Stipulated Motion for Dismissal by April 25, 2024, the Court will order post-		
24	settlement dismissal.		
25	[Signatures and Proposed Or	der on Following Page]	
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1	DATED this 27th day of March, 2024.	
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3	ROBERT W. FERGUSON Attorney General	CIVIL RIGHTS JUSTICE CENTER, PLLC
4		a / Dawn I Daylou
5	s/ Scott Barbara SCOTT M. BARBARA, WSBA No. 20885	s/ Darryl Parker DARRYL PARKER, WSBA No. 30770 1833 N 105 th Street, Suite 201
6	Senior Counsel - Torts Division 800 5th Ave, Ste. 2000	Seattle, WA 98133
7	Seattle, WA 98104 Tel: 206-389-2033	Tel: 206-557-7719 Email: dparker@civilrightsjusticecenter.com
8	Email: scott.barbara@atg.wa.gov Attorneys for State Defendants	Attorney for Plaintiff
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11	[PROPOSED] ORDER	
12	IT IS SO ORDERED that, in light of the parties' Notice of Settlement, the parties shall file	
13	a Stipulated Motion for Dismissal by April 25, 2024 and, failure to do so shall result in the Court's	
14	entering an order of post-settlement dismissal.	
15	DONE THIS 27th day of March 2024.	
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17	John C Coylina	
18	John Coyhan a	
19	U.S. District Judge	
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1	CERTIFICATE OF SERVICE		
2	I certify that I caused a copy of this document to be served on all parties or their counsel		
3	of record on the date below as follows:		
5	Email, per e-service agreement		
6	Darryl Parker, WSBA #30770 Civil Rights Justice Center, PLLC		
7	1833 N 105th Street, Suite 201 Seattle, WA 98133		
8	T: (206) 557-7719 F: (206) 659-0183		
9	dparker@civilrightsjusticecenter.com Attorneys for Plaintiff		
10	Copies to:		
11	pbussard@civilrightsjusticecenter.com vsharma@civilrightsjusticecenter.com		
12	☐ CM/ECF Filing System Electronic Service		
13	DATED this 27th day of March, 2024.		
14			
15	s/ Scott Barbara SCOTT M. BARBARA, WSBA No. 20885		
16	Assistant Attorney General 800 5th Ave, Ste 2000		
17	Seattle, WA 98104 Tel: 206-464-7352 Fax: 206-587-4229		
18 19	Email: scott.barbara@atg.wa.gov		
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