

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

EMMANUEL DUNAGAN, *et al.*,

Plaintiffs,

v.

ILLINOIS INSTITUTE OF ART-CHICAGO,
LLC, *et al.*,

Defendants.

Case No. 1:19-cv-00809

Honorable Jeffrey I. Cummings
Magistrate Judge Heather K. McShain

PARTIES' JOINT SUPPLEMENTAL SETTLEMENT STATUS REPORT

Pursuant to this Court's April 5, 2024, Order (Dkt. 282), Plaintiffs Emmanuel Dunagan, Jessica Muscari, Robert J. Infusino, Stephanie Porreca, Keishana Mahone, and Lakeisha Howard-Williams ("Plaintiffs"), together with Defendants Brent Richardson, Chris Richardson, Shelly Murphy ("Individual Defendants"), and the Dream Center Foundation (collectively, "Defendants") provide the following update.¹

On June 5, 2024, Plaintiffs and Defendants reached a contingent agreement in principle that would resolve this dispute, subject both to the resolution of certain details between the parties as well as certain other contingencies that Defendants are working to resolve. The parties welcome a conference with the Court to address questions about the foregoing. In light of this development, the parties request (and will soon file a joint motion seeking) a two-month extension of all deadlines which would allow Defendants time to address these contingencies and allow all parties to avoid the accumulation of attorneys' fees and other expenditures—including significant

¹ Third-party Defendant the Higher Learning Commission ("HLC") takes no position on this status report.

upcoming expert expenditures—that could cut into the class recovery or otherwise undermine the contingent agreement. The parties propose that the next joint status report regarding settlement status be due on July 15, 2024.

Dated: June 11, 2024

Respectfully submitted,

/s/ Tara Goodwin

Daniel A. Edelman
Tara L. Goodwin
EDELMAN, COMBS, LATTURNER &
GOODWIN, LLC
20 South Clark Street, Suite 1500
Chicago, IL 60603-1824
(312) 739-4200
(312) 419-0379 (fax)
Email address for service:
courtecl@edcombs.com

Alexander S. Elson
Eric Rothschild
NATIONAL STUDENT LEGAL
DEFENSE NETWORK
1701 Rhode Island Ave, NW
Washington D.C. 20036
alex@defendstudents.org
eric@defendstudents.org
Attorneys for Plaintiffs

/s/ Howard J. Rosenberg

Howard J. Rosenberg
KOPECKY SCHUMACHER ROSENBERG
LLC
120 N. LaSalle, Street, Suite 2000
Chicago, IL 60602
hrosenberg@ksrlaw.com

/s/ John C. Ochoa

Eric L. Samore
John C. Ochoa
Gary Zhao
AMUNDSEN DAVIS, LLC
150 N. Michigan Avenue, Suite 3300
Chicago, Illinois 60601
(312) 894-3200
esamore@amundsendavislaw.com
jochoa@amundsendavislaw.com
gzhao@amundsendavislaw.com
Attorneys for Defendant DCF

/s/ Kenneth L. Schmetterer

Raj N. Shah
Eric M. Roberts
Kenneth L. Schmetterer
Yan Grinblat
DLA PIPER, LLP (US)
444 West Lake Street, Suite 900
Chicago, Illinois 60606-0089
(312) 368-2176
raj.shah@us.dlapiper.com
eric.roberts@us.dlapiper.com
kenneth.schmetterer@dlapiper.com
yan.grinblat@us.dlapiper.com

**Attorneys for Defendants
Brent and Chris Richardson**

Attorney for Defendant Shelly Murphy

/s/ Amy M. Gibson

Amy M. Gibson

Maryam H. Arfeen

Aronberg Goldgehn Davis & Garmisa

225 W. Washington Street Suite 2800

Chicago, Illinois 60606

agibson@agdglaw.com

marfeen@agdglaw.com

*Attorneys for the Higher Learning
Commission*

CERTIFICATE OF SERVICE

I, Tara L. Goodwin, hereby certify that on June 11, 2024, I filed the foregoing document via the CM/ECF System, which caused notification of such filing to be sent to all counsel of record.

/s/ Tara Goodwin
Tara L. Goodwin

Daniel A. Edelman
Tara L. Goodwin
EDELMAN, COMBS, LATTURNER & GOODWIN, LLC
20 S. Clark St., Suite 1500
Chicago, Illinois 60603
(312) 739-4200
(312) 419-0379 (FAX)