

No. 1-20-1197

**IN THE APPELLATE COURT OF ILLINOIS
FIRST JUDICIAL DISTRICT**

DAVE MCCORMICK, T’LANI ROBINSON,
DENNIS MAGANA, SCOTT SWINDELL,
DAVID TOROSYAN, and ROBBY BROWN,
individually and on behalf of all others
similarly situated,

Plaintiffs-Appellees,

v.

ADTALEM GLOBAL EDUCATION INC.,
formerly known as DEVRY EDUCATION
GROUP, INC., a Delaware Corporation,
DEVRY UNIVERSITY, INC., a Delaware
corporation,

Defendants-Appellees,

and

JOSE DAVID VALDERRAMA,

Objector-Appellant,

and

RICHARDO PEART,

Objector-Appellant.

On Appeal From the
Circuit Court of Cook County
Case No. 2018-CH-04872

The Honorable Michael Tully Mullen

JOINT MOTION TO STAY

Plaintiffs-Appellees David McCormick, T’Lani Robinson, Dennis Magana, Scott Swindell, David Torosyan, and Robby Brown (the “Plaintiffs-Appellees”); Defendants-Appellees Adtalem Global Education Inc. (“Adtalem”) and DeVry University, Inc. (“DeVry”);

Objector-Appellant Jose David Valderrama (“Valderrama”); and Objector-Appellant Richardo Peart (“Peart”) (collectively, the “Parties”) hereby jointly move this Court to stay proceedings until February 7, 2022, to permit the Parties to engage in settlement discussions. In support, the Parties state as follows:

1. On October 8, 2020, Judge Michael Tully Mullen entered an Order Granting Final Approval of Class Action Settlement Agreement (the “Order”).

2. On November 2, 2020, and November 5, 2020, Valderrama and Peart each filed a Notice of Appeal appealing, in part, the circuit court’s Order.

3. On November 2, 2021, counsel for Adtalem and DeVry and counsel for Valderrama attended a full-day mediation before the Honorable Judge Philips (Ret.) of Philips ADR in Newport Beach, California, regarding related actions. As a result of the mediation, the attendees reached an agreement in principle to settle these related actions, as well as Valderrama’s objection and appeal in the instant action. That settlement in principle is being finalized.

4. Counsel for the remaining parties have conferred regarding a potential resolution of Peart’s objection and appeal, including the possibility of engaging in mediation to resolve this matter. To permit time for that to occur, the Parties jointly request a stay of this Court’s consideration of the Peart and Valderrama appeals.

5. Accordingly, the Parties respectfully request that the Court enter an order staying this action until February 7, 2022, to permit the Parties to focus their efforts on a potential resolution of the matter, at which point they will submit a joint status report informing the Court of their progress.

Dated: December 6, 2021

Respectfully submitted,

**DAVE MCCORMICK, T'LANI
ROBINSON, DENNIS MAGANA,
DAVID TOROSYAN, AND
ROBBY BROWN**

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Circuit Court Case No.
2018-CH-04872

Hon. Michael Tully Mullen

NOTICE OF FILING AND CERTIFICATE OF SERVICE

Please take notice that on December 6, 2021, I filed this notice with the Clerk of the

Appellate Court of Illinois, First District, by electronic means using the Court's electronic filing service provider eFileIL, and that I served the same upon the following persons in the same manner:

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