IN THE UNITED STATES COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

TEXAS TRIBUNE, MANO AMIGA, and CALDWELL/HAYS EXAMINER, Plaintiffs,	§	
v.	§	
CALDWELL COUNTY, TEXAS, TREY HICKS, in his official capacity as Caldwell County Court at Law Judge and Caldwell County Magistrate,	§	Civil Action No. 1:23-cv-910
MATT KIELY, SHANNA CONLEY, ANITA DELEON, and YVETTE MIRELES, in their official capacities as Caldwell County Justices of the Peace and Caldwell County Magistrates, and	§	
MIKE LANE, in his official capacity as the Sheriff of Caldwell County, Defendants.	§	

JOINT MOTION TO EXTEND STAY

In accordance with the Docket Text Order dated September 2, 2025, Plaintiffs Texas Tribune, Mano Amiga and Caldwell/Hays Examiner and Defendants Caldwell County, Texas, the Honorable Trey Hicks, in his official capacity as Caldwell County Court at Law Judge and Caldwell County Magistrate, the Honorable Matty Kiely, the Honorable Shanna Conley, the Honorable Anita DeLeon, and the Honorable Yvette Mireles, in their official capacities as Caldwell County Justices of the Peace and Caldwell County Magistrates, and the Honorable Mike Lane, in his official capacity as the Sheriff of Caldwell County, (hereinafter "Parties") file this joint motion to extend the stay.

During the stay extension, the Parties and their counsel have engaged in fruitful discussions and exchanged further drafts of the terms of a potential settlement. The Parties now respectfully request that the Court permit them to conclude discussions to resolve this matter.

WHEREFORE, the Parties respectfully request that the Court permit them to continue settlement negotiations and file either dismissal papers or an agreed motion to extend the stay on or before November 21, 2025.

DATED: October 10, 2025

/s/ Camilla Hsu
Camilla Hsu
State Bar No. 24130207
Deason Criminal Justice Reform Center
SMU Dedman School of Law
P.O Box 750116 | Dallas, TX 75275
(214) 768-6974
camillah@smu.edu
Counsel for Plaintiffs Mano Amiga and Caldwell/Hays Examiner

/s/ Scott Wilkens
Scott Wilkens, Pro Hac Vice
Knight First Amendment Institute at
Columbia University
475 Riverside Drive, Suite 302
New York, NY 10115
(646) 745-8500
scott.wilkens@knightcolumbia.org
Counsel for Plaintiffs

/s/ J. Eric Magee
J. Eric Magee
SBN: 24007585
e.magee@allison-bass.com
Susana Naranjo-Padron
SBN: 24105688
s.naranjo-padron@allison-bass.com
ALLISON, BASS & MAGEE, L.L.P.
1301 Nueces Street, Suite 201
Austin, Texas 78701
(512) 482-0701 telephone
Counsel for Defendants