

5. Prior to the filing of the Verified Complaint, an appeal was noticed from the Superior Court of Decatur County, Georgia, in the case of *State v. Decatur County-Bainbridge Industrial Development Authority, et al.*, No. 23CV00260, to the Georgia Court of Appeals, but that appeal has not yet been docketed. That appeal may have some affect on the issues in this case.

6. The Parties have engaged in discussions concerning Plaintiff's Motion for Preliminary Injunction and further proceedings in this case.

7. The Parties request the Court grant Plaintiff's Motion for Preliminary Injunction and toll the closing deadline stated in the Project Agreement and all other deadlines related to the Project (as defined in the Verified Complaint) to maintain the status quo pending resolution of this case.

8. The Parties further request the Court stay this case for 120 days, or until the resolution of the appeal of *State v. Decatur County-Bainbridge Industrial Development Authority, et al.*, whichever is sooner.

9. A proposed consent order granting the requested relief is being presented herewith.

Respectfully submitted this 20th day of February, 2024.

[Signatures on Following Page]

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CERTIFICATE OF SERVICE

I certify that on February 20, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to all attorneys of record.

/s/ Alfreda L. Sheppard

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