

**IN THE UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF OKLAHOMA**

MUSCOGEE (CREEK) NATION, )  
a federally recognized Indian Tribe, )  
 )  
Plaintiff, )

vs. )

Case No. 23-CV-490-JDR-SH

CITY OF TULSA; G.T. BYNUM, in his official )  
capacity as Mayor of City of Tulsa; WENDELL )  
FRANKLIN, in his official capacity as Chief of )  
Police, Tulsa Police Department; and JACK )  
BLAIR, in his official capacity as City Attorney )  
for City of Tulsa, )  
 )  
Defendants. )

**JOINT MOTION TO STAY PROCEEDINGS**

**COMES NOW** the Plaintiff and Defendants and jointly request that this Court enter an Order issuing a stay of this case for 30 days to allow the parties time to participate in settlement discussions. In support of the motion, the parties represent that:

1. This case was filed in November 2023 by the Muscogee (Creek) Nation requesting injunctive and declaratory relief regarding the City’s exercise of criminal jurisdiction over Indians within the Nation’s Reservation in light of *McGirt v. Oklahoma*, 591 U.S. 894 (2020). Dkt. 002.
2. The Plaintiff has filed a Motion For Preliminary Injunction which is presently pending before this Court. Dkt. 009. The Defendants have filed a motion to dismiss which is also pending. Dkt. 028.
3. The parties have recently engaged in active settlement discussions in an effort to resolve this matter by agreement between the parties..

4. In order to allow time for these discussions, the parties jointly request this Court enter an Order saying this matter for 30 days.

5. A proposed Order has been submitted in compliance with local rules.

**WHEREFORE**, for the reasons set forth herein, the parties jointly request this Court enter an Order staying this action for 30 days.

Respectfully Submitted,

For the Plaintiff:

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For the Defendants:

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**CERTIFICATE OF MAILING**

I, Kristina L. Gray, hereby certify that on the 16 day of December, 2024, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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/s Kristina L. Gray  
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