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

PROPERTY OWNERS WITHSTANDING ETJ RETRACTIONS; and THE SCHOENSTATT MOVEMENT OF AUSTIN, *Plaintiffs,* v. CITY OF AUSTIN; T.C. BROADNAX, *in his official capacity* as City Manager; and KEITH MARS, *in his official capacity* as Director of Development Services Department, *Defendants.*	Civil Action No. 1:26-cv-01518-RP

JOINT MOTION FOR ENTRY OF AGREED FINAL JUDGMENT

Plaintiffs Property Owners Withstanding ETJ Retractions ("POWER") and The Schoenstatt Movement of Austin ("Schoenstatt") (collectively, the "Property Owners"), and Defendants the City of Austin, T.C. Broadnax, and Keith Mars (collectively, the "City"), jointly move the Court to lift the stay for the limited purpose of entering judgment and to enter the Agreed Final Judgment attached as Exhibit A. In support, the parties state:

1. On August 4, 2026, the Court granted the Property Owners' motion for a preliminary injunction and enjoined the City from enforcing its March 2026 retraction of the prior ETJ releases. *See* ECF No. 16.

2. On August 27, 2026, the parties jointly moved to stay this action so that they could finalize a preliminary settlement agreement. *See* ECF No. 19.

3. The Court granted the motion on August 28, 2026.

4. The parties have now finalized their agreement to resolve all claims between all parties, and agree to the entry of the Agreed Final Judgment attached as Exhibit A.

5. Because the Agreed Final Judgment disposes of every claim and every party, its entry will close this case. The parties therefore ask the Court to lift the stay only to the extent necessary to enter the Agreed Final Judgment.

PRAYER

The parties respectfully request that the Court lift the stay for the limited purpose of entering judgment, sign and enter the Agreed Final Judgment attached as Exhibit A, and grant such other and further relief to which the parties may be entitled.

Dated: October 21, 2026.

Respectfully submitted,

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Counsel for Defendants

CERTIFICATE OF SERVICE

I certify that on October 21, 2026, a true and correct copy of the foregoing was served on all counsel of record in accordance with the Federal Rules of Civil Procedure via the Court's electronic filing system.

/s/ Alexa L. Gervasi
Alexa L. Gervasi