

**IN THE CIRCUIT COURT FOR THE SEVENTH JUDICIAL CIRCUIT
IN AND FOR FLAGLER COUNTY, FLORIDA**

PALM COAST HOLDINGS, INC.
and FLORIDA LANDMARK
COMMUNITIES, LLC.,

Plaintiffs,

CASE NO: 2025 CA 000670
DIVISION: 49

v.

CITY OF PALM COAST,
a Florida municipal corporation,

Defendant.

_____ /

**JOINT MOTION TO STAY PROCEEDINGS AND
CANCEL ALL PENDING DEADLINES**

Plaintiffs, Palm Coast Holdings, Inc. and Florida Landmark Communities, LLC, and Defendant, City of Palm Coast (collectively, the “Parties”), by and through their respective undersigned counsel, hereby jointly move this Court to stay these proceedings and cancel all pending deadlines, and in support thereof state as follows:

1. The Parties have reached a tentative settlement agreement that, if finalized, will resolve all claims in this action.
2. The settlement involves the purchase and sale of real property that is the subject of this litigation.
3. The Parties need additional time to finalize the settlement and complete the purchase and sale transaction, which is expected to close in approximately ninety (90) days.

4. Pursuant to the Court's Order Scheduling Trial and Directing Pretrial Procedures dated February 4, 2026, the Parties request cancellation of all pending deadlines in this matter, including but not limited to the following:

- a. Docket Sounding: November 3, 2026, at 2:30 p.m.;
- b. Trial: Two-week period commencing November 16, 2026.

5. A stay of these proceedings and cancellation of all pending deadlines, including the docket sounding and trial dates, will allow the Parties to focus their efforts on finalizing the settlement without the burden and expense of continued litigation.

6. The Parties respectfully request that the Court retain jurisdiction over this matter until the purchase and sale transaction closes, which is expected to occur in approximately ninety (90) days.

7. The Parties will promptly notify the Court when the purchase and sale has closed and will file appropriate documentation to conclude this matter.

WHEREFORE, the Parties jointly and respectfully request that this Court enter an Order: (1) staying all proceedings in this matter; (2) cancelling all pending deadlines, including the docket sounding scheduled for November 3, 2026, and the trial scheduled to commence during the November 16, 2026 trial period; and (3) retaining jurisdiction over this matter until the purchase and sale transaction closes or until further order of this Court.

Date: August 19, 2026

/s/ D. Kent Safriet

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CERTIFICATE OF SERVICE

I certify that a copy of this document was filed via Florida Courts E-filing Portal this
19th day of **August** 2026, which will transmit a copy to all counsel of record.

/s/ D. Kent Safriet

Attorney