

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 1:21-cv-304-CNS-MDB

ROBERT HARRISON and GRACE
HEATH, on behalf of themselves, the
ENVISION MANAGEMENT HOLDING,
INC. ESOP, and all other similarly
situated individuals,

Plaintiffs,

v.

ENVISION MANAGEMENT HOLDING,
INC. BOARD OF DIRECTORS,
ENVISION MANAGEMENT HOLDING,
INC. EMPLOYEE STOCK OWNERSHIP
PLAN COMMITTEE, ARGENT TRUST
COMPANY, DARREL CREPS, III, PAUL
SHERWOOD, JEFF JONES, NICOLE
JONES, AARON RAMSAY, TANWEER
KHAN, and LORI SPAHN,

Defendants.

**JOINT NOTICE OF SETTLEMENT AND REQUEST FOR A STAY PURSUANT TO
LOCAL CIVIL RULE 40.2(b)**

Pursuant to D.C. Colo. LCivR 40.2(b), Plaintiffs and Defendants (collectively the “Parties”), by their undersigned counsel, respectfully notify the Court that the Parties have reached an agreement in principle to settle the above-captioned matter on a class basis. The Parties have agreed to the material terms in a final signed term sheet, and are in the process of preparing the settlement agreement and preliminary approval papers.

The Parties have agreed to execute a final settlement agreement by November 20, 2026. The Parties request that the Court set a deadline of Friday, December 4, 2026, to file the preliminary approval motion. Further, in light of the settlement, the Parties

request that the Court adjourn the trial scheduled to begin on October 26, 2026, and stay all deadlines in this matter pending preliminary approval of the settlement.

DATED: October 23, 2026

/s/ Michelle C. Yau
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 23, 2026, a true and correct copy of the foregoing was served on all counsel of record.

/s/ Lars C. Golumbic

Lars C. Golumbic