

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
Southern Division**

**MARVIN TUTT,  
Plaintiff,**

**Civil Action No. \_\_\_\_\_**

**v.**

**REGINA ROBINSON, et al.,  
Defendants.**

---

# **MOTION FOR EARLY SETTLEMENT CONFERENCE**

Plaintiff Marvin Tutt respectfully moves this Court to schedule an immediate settlement conference, demonstrating that early resolution would serve the interests of justice, judicial economy, and all parties.

## **I. INTRODUCTION**

While Plaintiff has strong claims supported by documentary evidence, he recognizes that early settlement could benefit all parties by avoiding the costs, risks, and publicity of protracted litigation. This motion seeks Court assistance in facilitating productive settlement discussions.

## **II. SETTLEMENT CONSIDERATIONS**

### **A. Why Early Settlement Makes Sense**

- 1. Pre-Discovery Advantage**
  - Avoids extensive discovery costs
  - Maintains confidentiality of sensitive information
  - Prevents public exposure of alleged misconduct
  - Allows parties to control narrative
- 2. Plaintiff's Objectives Are Limited**
  - Seeks compensation for specific personal harms
  - Not pursuing class action or systemic litigation
  - Willing to consider confidentiality provisions
  - Focused on moving forward, not destroying agencies
- 3. Escalating Exposure**

- Current exposure: Settlement discussions
- After discovery: Exponentially higher costs and risks
- After trial: Maximum damages plus precedent

## **B. Evidence of Good Faith**

### **1. Plaintiff's Approach**

- Filed individual suit, not class action
- Limited discovery requests to case-specific information
- Expressed willingness to discuss resolution
- Not seeking media attention

### **2. Discrete Resolution Possible**

- Regina Robinson's liability: \$3 million proposal
- Institutional defendants: Negotiable framework
- Injunctive relief: Focused on Plaintiff's protection
- Confidentiality: Available if mutually desired

## **C. Settlement Economics**

### **Cost-Benefit Analysis for Defendants:**

- Settlement now: Controlled, confidential resolution
- Litigation costs: Potentially millions in defense
- Trial exposure: \$1.2 billion claimed damages
- Criminal investigation: Ongoing regardless
- Reputation impact: Minimized through early resolution

# **III. PROPOSED CONFERENCE FRAMEWORK**

## **A. Timing**

Immediate conference benefits all parties:

- Before extensive discovery costs
- While positions remain flexible
- Before media attention intensifies
- During optimal settlement window

## **B. Structure**

### **1. Magistrate Judge Facilitation**

- Neutral facilitator with settlement experience
- Separate caucuses if needed
- Confidential discussions

## **2. Phased Approach**

- Address discrete issues separately
- Robinson liability distinct from institutional claims
- Injunctive relief separate from damages

## **3. Preparation Requirements**

- Settlement position statements
- Key document exchange
- Decision-maker attendance

# **IV. LEGAL AUTHORITY**

## **A. Local Rule 607**

This District encourages early settlement discussions and authorizes judges to conduct settlement conferences at any stage.

## **B. Federal Rule 16**

Fed. R. Civ. P. 16 explicitly authorizes pretrial conferences for "facilitating settlement of the case."

## **C. Judicial Policy**

"[T]he court has inherent power to command litigants to appear before it for a settlement conference." *In re Atlantic Pipe Corp.*, 304 F.3d 135, 143 (1st Cir. 2002).

# **V. BENEFITS TO COURT AND PUBLIC**

## **A. Judicial Economy**

- Avoids complex multi-defendant litigation
- Preserves court resources
- Reduces docket congestion
- Eliminates need for extensive motions practice

## **B. Public Interest**

- Protects sensitive government information
- Avoids disruption to public services
- Enables quiet reforms if appropriate
- Maintains public confidence in justice system

## **VI. NO PREJUDICE FROM CONFERENCE**

### **A. Without Prejudice**

All settlement discussions would be:

- Confidential under FRE 408
- Without admission of liability
- Non-binding unless agreement reached
- Protective of litigation positions

### **B. Litigation Continues if Needed**

If settlement fails:

- Case proceeds normally
- No delays to scheduling
- Discovery continues
- Trial rights preserved

## **VII. SPECIFIC SETTLEMENT PARAMETERS**

To facilitate productive discussions, Plaintiff notes:

1. **Monetary Component**
  - Open to structured payments
  - Willing to discuss reasonable amounts
  - Medical documentation available
  - Economic losses documented
2. **Injunctive Relief**
  - Cessation of current violations
  - Record corrections
  - Future protections
  - No admission of wrongdoing required
3. **Creative Solutions**
  - Consulting arrangements possible
  - Non-monetary compensation considered
  - Confidentiality provisions available
  - Forward-looking focus

## **VIII. ROBINSON SETTLEMENT OPPORTUNITY**

Plaintiff specifically proposes immediate resolution of Defendant Regina Robinson's liability for \$3,000,000, which would:

- Remove her from litigation entirely
- Seal sensitive personal communications
- Allow focus on institutional defendants
- Protect minor child from continued exposure
- Demonstrate Plaintiff's reasonable approach

This severable settlement could proceed immediately, simplifying remaining issues.

## IX. CONCLUSION

Early settlement conference serves all interests. Plaintiff's willingness to engage in good faith discussions before extensive discovery demonstrates reasonableness and desire for efficient resolution. The Court's involvement could facilitate resolution that litigation might not achieve.

Time is critical—each day moves parties further from settlement and closer to protracted litigation.

WHEREFORE, Plaintiff respectfully requests this Court:

1. Schedule a settlement conference within 30 days
2. Appoint a magistrate judge to facilitate if appropriate
3. Order parties to appear with full settlement authority
4. Enter appropriate orders to facilitate productive discussions

Respectfully submitted,

---

Marvin Tutt  
Plaintiff, Pro Se  
[Address filed under seal]  
marvindtutt@gmail.com

---

## CERTIFICATE OF SERVICE

I hereby certify that on \_\_\_\_\_, 2025, I will serve a copy of this motion on all defendants via [method of service].

---

Marvin Tutt