

CAUSE NO. DC-24-06045

LUCAS WREN,

IN THE DISTRICT COURT

Plaintiff/Counter Defendant,

v.

**TARO COMPANY LLC, THRIVE
DENTAL AND ORTHODONTICS
PLLC, BRECKINRIDGE DENTAL
AND ORTHODONTICS PLLC,
THRIVE DENTAL PM PLLC,
THRIVE DENTAL ALLEN PLLC,
THRIVE DENTAL SACHSE PLLC,
NATHAN COUGHLIN,
INDIVIDUALLY, AND CHRISTINE
COUGHLIN, INDIVIDUALLY,**

95th JUDICIAL DISTRICT

Defendants,

v.

**TARO COMPANY LLC, THRIVE
DENTAL AND ORTHODONTICS
PLLC, BRECKINRIDGE DENTAL
AND ORTHODONTICS PLLC,
THRIVE DENTAL PM PLLC,
THRIVE DENTAL ALLEN PLLC,
THRIVE DENTAL SACHSE PLLC,**

DALLAS COUNTY, TEXAS

Counter-Plaintiffs.

AGREED MOTION TO STAY OR ABATE CASE

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW Lucas Wren, Plaintiff, and Taro Company LLC, Thrive Dental and Orthodontics PLLC, Breckinridge Dental and Orthodontics PLLC, Thrive Dental PM PLLC, Thrive Dental Allen PLLC, Thrive Dental Sachse PLLC, Nathan Coughlin, and Christine Coughlin, Defendants, and would respectfully show this Court the following:

I.

1. The parties have reached an agreement to resolve and settle all disputes and controversies that exist in this case. A written Compromise Settlement Release Agreement has been entered into.

2. Under the terms of this Agreement, the Defendants have agreed to pay the total sum of \$350,000 to the Plaintiff in monthly installments of (at least) \$10,000 per month. Defendants have also agreed that if they fail to make any payment that is called for under the terms of this Agreement within five (5) days from the date that it is due (under the terms of the Agreement) the Plaintiff may present an Agreed Final Judgment (signed by the Defendants) to the Court for entry. If all payments called for under the terms of the Agreement are made in a timely manner then an Agreed Motion to Dismiss will be filed with the Court and an Agreed Order of Dismissal will be presented to the Court for entry.

3. To allow the steps outlined above to take place without having the Court lose plenary power to execute the Agreed Final Judgment or the Agreed Order of Dismissal the parties respectfully ask that the Court enter an Order that stays or abates this case until either (a) the Plaintiff is permitted (as detailed above) to submit the Agreed Final Judgment to the Court for entry, or (b) the settlement amount is fully paid, and the parties submit the Agreed Order of Dismissal to the Court for entry.

WHEREFORE, PREMISES CONSIDERED, Plaintiff and Defendants respectfully pray that this Agreed Motion be received and filed and, upon consideration, that the relief requested herein be granted.

Respectfully submitted,

FEE, SMITH & SHARP L.L.P.

/s/ HOWARD J. KLATSKY

HOWARD J. KLATSKY

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**ATTORNEYS FOR DEFENDANTS AND
COUNTER PLAINTIFFS**

CERTIFICATE OF SERVICE

THIS WILL CERTIFY that a true and correct copy of the foregoing instrument has been mailed, telecopied or hand delivered to all attorneys of record in this cause of action on the 16th day of September, 2025 as follows:

Via E-filing & Email

Brett B. Stalcup

STALCUP LAW

3811 Turtle Creek Blvd., Suite 175

Dallas, Texas 75219

/s/ HOWARD J. KLATSKY

HOWARD J. KLATSKY

Automated Certificate of eService

This automated certificate of service was created by the efilng system. The filer served this document via email generated by the efilng system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Howard Klatsky

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Envelope ID: 105630869

Filing Code Description: Motion - Stay

Filing Description: AGREED OR ABATEMENT

Status as of 9/16/2025 12:44 PM CST

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