

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

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CHARLIE and NADINE H., <i>et al.</i> ,	: Civil No. 2:99-cv-03678 (SRC)
	:
Plaintiffs,	:
	:
v.	:
	:
CHRIS CHRISTIE, as Governor of the State of New	:
Jersey, <i>et al.</i> ,	:
	:
Defendants.	:
----- X	

**STIPULATED AMENDMENTS TO THE MODIFIED SETTLEMENT AGREEMENT
AND REQUEST FOR COURT APPROVAL**

The Settlement Agreement in this case was approved and entered by the Court on September 2, 2003, and the subsequent Modified Settlement Agreement (“MSA”) was approved and entered by the Court on July 27, 2006. On April 19, 2012, the Parties met to discuss the potential amendment of certain provisions in the MSA and certain performance benchmarks for compliance with the MSA. The Parties ultimately agreed to propose modifications to two provisions of the MSA by extending the required time period for filing petitions to terminate parental rights from within six weeks to within 60 days of the date a child’s permanency goal is changed to adoption. This amendment makes the required time period consistent with New Jersey Family Court Practice.

Accordingly, the Parties now stipulate and agree as follows:

1. Paragraph II.G.2.d of the MSA, which currently states: “The termination of parental rights petition shall be filed within six weeks of the permanency hearing,” will be revised to state: “The termination of parental rights petition shall be filed within 60 days of the date the goal was changed to adoption.”

2. Paragraph III.B.12(a)(i) of the MSA, which currently states: "at least 90% shall have a petition to terminate parental rights filed within six weeks of the date the goal was changed to adoption," will be revised to state: "At least 90% shall have a petition to terminate parental rights filed within 60 days of the date the goal was changed to adoption."

Other than as set forth herein, all previous stipulations and orders in this action, including all other provisions of the MSA, shall remain in full force and effect.

Dated: August 3, 2012

SO ORDERED: 8/7/12



HONORABLE STANLEY R. CHESLER DATE

APPROVED FOR ENTRY:

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