

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

BRIAN A., et al.)	
)	
Plaintiffs,)	Civ. Act. No. 3:00-0445
)	Judge Todd J. Campbell
v.)	Magistrate Judge Joe B. Brown
)	
BILL HASLAM, et al.)	
)	
Defendants.)	

*******STIPULATED ONE-TIME MODIFICATION OF SECTION XV.A OF THE
SEPTEMBER 2013 MODIFIED SETTLEMENT AGREEMENT AND EXIT PLAN
AND REQUEST FOR COURT APPROVAL**

On September 19, 2013, the Court approved the parties’ proposed September 2013 Modified Settlement Agreement and Exit Plan, Dkt. No. 500 (“September 2013 Exit Plan”), which provides in Section XV.A:

The [Technical Assistance Committee] shall continue in the role of independent Monitor that will evaluate, monitor and report on performance under the terms of this agreement until this Court’s jurisdiction terminates as described in Section XVIII.D. The TAC shall issue reports on performance under this agreement for the twelve-month period from January 1, 2010, through and including December 31, 2010, and for each six-month period thereafter. . . .

Dkt. No. 500 at 28.

The parties and the TAC agree that an extended reporting period will better allow the TAC to carry out the data analysis and reviews required to conduct a robust assessment of performance.

Accordingly, pursuant to Section XVII of the September 2013 Exit Plan providing for requested modification “on the consent of the parties,” the parties agree to, and request the Court to approve, the following:

The next TAC report on performance shall cover the twelve-month period from January 1, 2014 through and including December 31, 2014. The TAC shall issue reports for each six-month period thereafter, unless amended upon further Order of this Court.

The modification set forth above shall be in addition to the TAC issuing a supplemental report on or before December 31, 2014, on provisions in the Exit Plan agreed upon by the parties and the TAC, provided that the parties and the TAC shall follow the procedures in Section XVIII.C regarding the identification of “Maintenance” provisions, and the filing of a proposed joint modification to the Exit Plan, following the production of a supplemental report.

DATED: September 2, 2014
Nashville, TN

APPROVED FOR ENTRY:

ATTORNEYS FOR PLAINTIFFS:

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SO ORDERED:

Todd Campbell
HONORABLE TODD J. CAMPBELL, U.S.D.J. DATE:

CERTIFICATE OF SERVICE

I, Sarah Russo, hereby certify that, on September 2, 2014, a true and correct copy of this Proposed Stipulated One-Time Modification of Section XV.A of the September 2013 Modified Settlement Agreement and Exit Plan and Request for Court Approval in the case of *Brian A. v. Haslam* has been served on Defendants' counsel Martha A. Campbell, Deputy Attorney General, General Civil Division, P.O. Box 20207, Nashville, TN 37202, and Jonathan Lakey, Pietrangelo Cook, PLC, 6410 Poplar Avenue, Suite 190, Memphis, TN 38119, electronically by operation of the Court's electronic filing system.

DATED: September 2, 2014

/s/ Sarah Russo
Sarah Russo