

**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.)	

**JOINT STIPULATION SEEKING COURT APPROVAL OF PROPOSED
SEPTEMBER 2014 MODIFIED SETTLEMENT AGREEMENT AND EXIT PLAN**

1. Pursuant to Section XVIII.C.3 of the September 2013 Modified Settlement Agreement and Exit Plan (Dkt. No. 500), which remains in full force and effect, the parties hereby jointly file with the Court a proposed joint modification to the September 2013 Modified Settlement Agreement and Exit Plan that includes revisions in the identification of provisions as MAINTENANCE. These revisions are based upon the Monitoring Report of the Technical Assistance Committee (“TAC”) dated May 31, 2014 (Dkt. No. 516-1), negotiations between the parties and the TAC, and supplemental information provided by the TAC in a Supplement to the 2014 Monitoring Report, dated August 27, 2014, attached hereto as Exhibit A.

2. If approved, the proposed September 2014 Modified Settlement Agreement and Exit Plan, attached hereto as Exhibit B, will replace and supersede the September 2013 Modified Settlement Agreement and Exit Plan in its entirety. The parties request that the September 2014 Modified Settlement Agreement and Exit Plan be signed by the Court and entered as a separate docket entry in this action. Also attached hereto as Exhibit C,

for the Court's convenience, is a version of the September 2014 Modified Settlement Agreement and Exit Plan that shows the changes in MAINTENANCE designations in redline. As reflected in the three exhibits to this Joint Stipulation, through the processes set forth in Section XIII.C, approval is requested for fourteen (14) new provisions to be identified as MAINTENANCE: Sections IV.B.1, IV.B.3, V.A, V.D.4 , V.H , V.I, VIII.C.5.b, VIII.D.2, IX.B.2, IX.E (second sentence), XI.E.2, XI.E.3, XI.E.4, and XIII.C. No provisions are proposed to be removed from MAINTENANCE.

DATED: September 2, 2014
Nashville, TN

APPROVED FOR ENTRY:

ATTORNEYS FOR PLAINTIFFS:

/s/ Ira Lustbader
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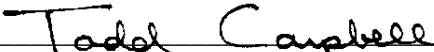
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SO ORDERED:



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 Joint Stipulation Seeking Court Approval of Proposed September 2014 Modified Settlement Agreement and Exit Plan 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