

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

ALICIA B. PPA, Through her Parent and Next
Friend, Cynthia B. and TOBIAS J. PPA,
Through his Parent and Next Friend, Robert J.,

Plaintiffs,

v.

DANNEL MALLOY, in his Official Capacity
as Governor of the State of Connecticut,
DIANNA WENTZELL, in her Official
Capacity as Commissioner of the State Dept. of
Education, STATE DEPARTMENT OF
EDUCATION,

ALLAN B. TAYLOR in his Official Capacity
as Chairperson of the Board of Education,
STATE BOARD OF EDUCATION, BETH
SCHIAVINO-NARVAEZ, in her Official
Capacity as Superintendent of Hartford Board
of Education, HARTFORD BOARD OF
EDUCATION, MATTHEW GEARY in his
Official Capacity as Superintendent of
Manchester Board of Education,
MANCHESTER BOARD OF EDUCATION,
JAMES THOMPSON, JR. in his Official
Capacity as Superintendent of Bloomfield
Board of Education, BLOOMFIELD BOARD
OF EDUCATION,

Defendants.

CASE NO. 3:16-CV-00065 (SRU)

December 14, 2016

STIPULATION OF DISMISSAL

Plaintiffs, Alicia B., by and through her next friend Cynthia B., and Tobias J., by and through his next friend Robert J. (the “Plaintiffs”), and Defendants Beth Schiavino-Narvaez, in her official capacity as Superintendent of Hartford Public Schools and the Hartford Board of Education (the “Defendants”) (Collectively the “Parties”) in the above-referenced matter, do

hereby stipulate, pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, the following terms and conditions:

1. The Parties agree to settle and compromise the claims against Defendants Ms. Schiavino-Narvaez and the Hartford Board of Education under the terms and conditions set forth in the Settlement Agreements, attached as Attachment A and Attachment B (permission requested to file under seal).
2. In consideration of these Settlement Agreements, the Plaintiffs agree that the claims against Defendants Ms. Schiavino-Narvaez and the Hartford Board of Education shall be dismissed with prejudice in full satisfaction of any and all claims brought against these Defendants in this case.
3. The undersigned counsel represent that they are authorized to enter into this Stipulation on behalf of their clients.
4. Execution of this Stipulation by counsel for the Plaintiffs and counsel for the Defendants shall constitute a dismissal of the claims against Defendants Ms. Schiavino-Narvaez and the Hartford Board of Education with prejudice pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure.
5. This Stipulation shall be binding upon and inure to the benefit of the Parties hereto and their respective successors and assignees.
6. The Parties agree that a facsimile of the signatures of the parties and counsel will be the same as the original.
7. The Court shall retain jurisdiction to enforce the terms of this Stipulation and to conduct such further proceedings and award relief as may be necessary to resolve any breach of the attached Settlement Agreements by either of the Parties.

8. This Stipulation, read in accordance with the Settlement Agreements attached as Attachment A and Attachment B, shall become effective upon the Court's Order and shall be the final expression of the Parties' full and voluntary settlement agreement.
9. This Stipulation may not be altered, modified, withdrawn, waived, rescinded or supplemented in any way except by written instrument executed by duly authorized representatives of all parties.

THE PLAINTIFFS ALICIA B., CYNTHIA B.,
TOBIAS J. & ROBERT J.

By _____ /s/_____
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THE DEFENDANTS BETH SCHIAVINO-NARVAEZ
and HARTFORD BOARD OF EDUCATION

By _____/s/_____
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So Ordered, this ____ day of _____, 2016.

Hon. Stefan R. Underhill