

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 11-23776-CIV-KMM

WENDY RUIZ; NOEL SAUCEDO;
CAROLINE ROA; KASSANDRA
ROMERO; and JANETH AMERICA
PEREZ,

Plaintiffs,

v.

GERARD ROBINSON, Florida
Commissioner of Education, sued
in his official capacity; KATHLEEN
SHANAHAN, sued in her official
capacity; ROBERTO MARTINEZ,
sued in his official capacity; SALLY
BRADSHAW, sued in her official
capacity; GARY CHARTRAND, sued
in his official capacity; A.K. DESAL,
sued in his official capacity;
BARBARA S. FEINGOLD, sued
in her official capacity; JOHN R.
PADGET, sued in his official capacity;
FRANK T. BROGAN, Chancellor of
the State University System, sued in his
official capacity; DEAN COLSON, sued
in his official capacity; MORTEZA
"MORI" HOSSEINI, sued in his official
capacity; RICHARD A. BEARD, III,
sued in his official capacity; JOSEPH L.
CARUNCHO, sued in his official
capacity; CHRIS CORR, sued in his
official capacity; PARTICIA FROST,
sued in her official capacity; THOMAS
G. KUNTZ, sued in his official capacity;
MICHAEL LONG, sued in his official
capacity; AVA L. PARKER, sued in her
official capacity; TICO PEREZ, sued in
his official capacity; JOHN ROOD, sued
in his official capacity; GUS A.
STAVROS, sued in his official capacity;

JOHN W. TEMPLE, sued in his official capacity; NORMAN D. TRIPP, sued in his official capacity; and RICHARD A. YOST, sued in his official capacity;

Defendants.

**SETTLEMENT AGREEMENT ON
ATTORNEYS' FEES AND LITIGATION COSTS AND EXPENSES**

All Plaintiffs and all Defendants, by their respective counsel of record, hereby enter into this agreement ("Settlement Agreement") to settle all claims by Plaintiffs against Defendants for attorneys' fees and litigation costs and expenses incurred by Plaintiffs or their counsel in or in connection with the above-captioned action, pending in the United States District Court for the Southern District of Florida as Case Number 11-23776-CIV-KMM (the "Litigation"), including all statutory costs and non-statutory costs and expenses, for the sum of One Hundred Thousand Dollars (\$100,000.00), to be paid to the Southern Poverty Law Center Trust Account within thirty (30) days of execution of this Settlement Agreement by both of said counsel of record.

The parties enter into this Settlement Agreement with the advice of counsel, and aver that it is the result of arms' length negotiation and is fair and reasonable.

The Plaintiffs agree to accept the settlement amount in full satisfaction of all attorneys' fees and costs and expenses incurred in this litigation accruing or claimed at any time, including any appellate fees and costs and expenses, all unclaimed amounts for time or costs or expenses not yet raised in any motion or petition, and any attorneys' fees or costs or expenses which might have been claimed in the future, in the Litigation.

In consideration thereof, Plaintiffs hereby jointly and severally release and forever discharge each and every one of the Defendants of and from all claims for attorneys' fees and litigation costs

and expenses which Plaintiffs have had, now have, or may have against the Defendants or any one or more of them, in the Litigation.

Nothing in this Settlement Agreement should be construed as an admission of liability by Defendants, and this Settlement Agreement cannot be used as an admission by either party in this or any other proceeding.

The attorneys executing this Settlement Agreement hereby represent that they are authorized to enter into this Settlement Agreement on behalf of the Parties as indicated below.

For Plaintiffs:

For Defendants:

PAMELA JO BONDI
Attorney General

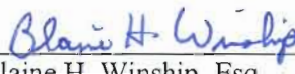


12/14/12

Date

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Counsel for All Plaintiffs



12/18/12

Date

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