

**SCANNED**

**UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE**

U.S. DISTRICT COURT  
PORTLAND, MAINE  
RECEIVED AND FILED

2006 OCT 24 P 1:42

**LAURIE TARDIFF,** )  
 )  
 **Plaintiff** )  
 **v.** )  
 )  
 **KNOX COUNTY, et al.,** )  
 )  
 **Defendants** )

BY \_\_\_\_\_  
**Docket No. 02-CV-251-P-C DEPUTY CLERK**

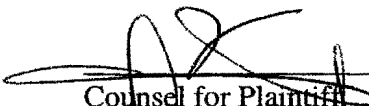

**SETTLEMENT AGREEMENT**

The parties hereby agree to settle this case in exchange for Defendants establishing a common fund of Three Million Dollars (\$3,000,000.00), said amount to include all attorneys' fees and costs incurred, as well as all claims administration expenses. The parties agree that counsel for Plaintiff will seek to recover 30% of this fund to cover their fees and costs. The parties agree that they will jointly move for re-certification of the class only for purposes of facilitating settlement and disbursing the balance of the above common fund to qualifying class members.

This settlement is subject to the approval of both the County and the Risk Pool. It is understood that Defense counsel will be recommending approval and that the necessary meetings and votes by both entities will occur before 1 PM on Monday, October 2, 2006. Subject to obtaining this approval, the parties agree that the final settlement agreement presented to the Court for approval will utilize provisions and procedures found in the Amended Settlement Agreement approved in Nilsen v. York County (02-CV-212-P-H). The parties will file their final written agreement along with a motion to re-certify the class on or before Tuesday, October 3, 2006.

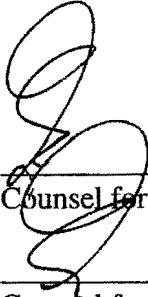
Date: 9/29/06

Date: 9/29/06

  
\_\_\_\_\_  
Counsel for Plaintiff  
  
\_\_\_\_\_  
Plaintiff Laurie Tardiff  
Class Representative

Date: 9/29/2006

Date: 9/29/2006

A handwritten signature in black ink, consisting of several loops and a vertical stroke, positioned above the signature lines.

\_\_\_\_\_  
Counsel for Defendant York County

\_\_\_\_\_  
Counsel for Defendant Sheriff Davey