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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
LAKISHA REYNOLDS, *et al.*,

Plaintiffs,

STIPULATION AND
ORDER

-against-

RUDOLPH GIULANI, *et al.*,

98 Civ. 8877 (WHP)

Defendants.
-----X

WHEREAS, plaintiffs Lakisha Reynolds, Georgina Bonilla, April Smiley, Lue Garlick, Adriana Calabrese, Jenny Cuevas, and Elston Richards (the "Plaintiffs") commenced this action against defendants Rudolph Giuliani and Jason Turner (the "City Defendants"), and Brian J. Wing and Barbara DeBuono (the "State Defendants") by the filing of a summons and complaint seeking declaratory and injunctive relief on behalf of a proposed plaintiff class; and

WHEREAS, the District Court (per the Honorable William H. Pauley III, USDJ) certified a plaintiff class ("Plaintiff Class"); and

WHEREAS, the Plaintiff Class is represented by the National Center for Law and Economic Justice (formerly the Welfare Law Center), the Legal Aid Society, the Northern Manhattan Improvement Corporation, and the New York Legal Assistance Group, Inc.; and

WHEREAS, on February 14, 2005, the Court issued an Amended Memorandum and Opinion finding, *inter alia*, the City and State Defendants liable to the Plaintiff Class for violations of State and federal law, as set forth therein; and

WHEREAS, by a Judgment dated December 14, 2005, the Court awarded the Plaintiff Class declaratory and injunctive relief as set forth therein, and determined that the Class was entitled to reasonable fees and costs, pursuant to 42 U.S.C. § 1988; and

WHEREAS, on April 23, 2010, the Court approved a Stipulation and Order settling the claims of the Plaintiff Class for attorneys' fees, costs and disbursements against City and State Defendants for the period from December 15, 2005 through December 14, 2008; and

WHEREAS, the Plaintiff Class seeks an award of fees and costs in this action for the period from December 15, 2008 through June 14, 2010, pursuant to the provisions of 42 U.S.C. § 1988 and as authorized by the Court in the Judgment; and

WHEREAS, the parties now seek to resolve the issues of attorneys' fees without further litigation of the fee application and on terms just and fair to all parties;

IT IS HEREBY STIPULATED, AGREED, AND ORDERED as follows:

1. The City of New York shall pay the Plaintiff Class, and the Plaintiff Class shall agree to accept, eighty-six thousand dollars (\$86,000.00) ("City Fee Payment"), in full satisfaction of all claims for attorneys' fees and costs sought by the Plaintiff Class as against the City Defendants for the period from December 15, 2008 through June 14, 2010.

2. Payment of the Fee Amount shall be made by checks, issued in the amounts that follow, made payable to the following entities, and at the addresses shown:

Organization	Amount	Address
New York Legal Assistance Group	\$ 60,694.73	Yisroel Schulman, 7 Hanover Square, 18 th Floor New York, NY 10004
Legal Aid Society	\$ 14,989.79	Katie Kelleher, The Legal Aid Society 199 Water Street, 3d Floor, New York, NY 10038
National Center for Law and Economic Justice	\$ 10,315.48	275 Seventh Ave., Suite 1506, New York, NY 10001

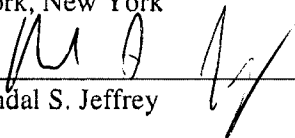
The City Defendants will deliver the Fee Payment within ninety days of the date this Stipulation is "so ordered" by the Court.

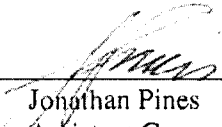
3. In consideration of the payment of the City Fee Payment, the Plaintiff Class agrees to release all City Defendants, any present or former employees or agents of the City of New York, and the City of New York from any and all claims for fees and costs arising in connection with the above-captioned action from December 15, 2008 through June 14, 2010, and this Stipulation shall be deemed a release to that effect.
4. This stipulation shall not be admissible in, nor is it related to, any other litigation or settlement negotiations outside of the above-captioned action.
5. This Stipulation and Order contains all the terms and conditions agreed upon by the parties hereto, and no oral agreement entered into at any time nor any written agreement entered into prior to the execution of this Stipulation and Order regarding the subject matter of this agreement shall be deemed to exist, or to bind the parties hereto, or to vary the terms and conditions contained herein.

6. Facsimile signatures are acceptable for execution and filing of this Stipulation.

DATED: July , 2011

New York, New York

By:  _____
Randal S. Jeffrey

By:  _____
Jonathan Pines
Assistant Corporation Counsel

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7/22/11

SO ORDERED:



WILLIAM H. PAULEY III U.S.D.J.

(Additional Counsel Listed on Following Page)

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IMPROVEMENT CORP.

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Tel. (212) 822-8300

Attorneys for Plaintiffs and Plaintiff Class

SO ORDERED:

DATED: NEW YORK, NEW YORK
July , 2011

WILLIAM H. PAULEY III
U.S.D.J.