

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
CENTRAL DIVISION

In the matter of)	Cases Nos. 4:03-cv-90074-RP-TJS,
))	4:02-cv-90447-RP-TJS,
AMERICANS UNITED FOR SEPARATION)	4:03-cv-90101-RP-TJS
OF CHURCH AND STATE, et al.,)	
)	
Plaintiffs,)	
)	
v.)	
)	
PRISON FELLOWSHIP MINISTRIES, et al.,)	
)	
Defendants.)	
_____)	

JOINT MOTION/STIPULATION BY ALL PARTIES
RE SETTLEMENT OF ATTORNEY’S FEES, COSTS, AND EXPENSES;
AND (PROPOSED) ORDER

All parties to this action hereby jointly move for and STIPULATE to the following, and the Court hereby ORDERS the following:

1. On or before September 2, 2008, the defendants in this action (“Defendants”) shall pay or cause to be paid, via wire transfer or cashier’s check, \$20,000 to plaintiff Americans United for Separation of Church and State.
2. Plaintiffs and Plaintiffs’ counsel will be solely responsible for the payment of any taxes that they may be required to pay under the law due to the payment of the settlement sum referenced in paragraph 1 hereof.
3. The settlement amount shall represent full satisfaction of any and all claims against Defendants by Plaintiffs, Plaintiffs’ counsel Americans United for Separation of Church and State, and Plaintiffs’ counsel Rosenberg Stowers & Morse for attorney’s fees, expenses, and costs for (a) work they performed in this case from January 16, 2008 through May 20, 2008, and

(b) work they performed after May 20, 2008 relating to attorney's fees, expenses, or costs for the January 16, 2008 through May 20, 2008 work.

4. Plaintiffs further acknowledge that the settlement amount paid pursuant to the Court's order of September 13, 2006 represented full satisfaction of any and all claims against Defendants by Plaintiffs, Plaintiffs' counsel Americans United for Separation of Church and State, and Plaintiffs' counsel Rosenberg Stowers & Morse for attorney's fees, expenses, and costs for work they performed in this case prior to January 16, 2008.

5. The Court hereby retains jurisdiction to enforce this Stipulation and Order. The parties are hereby deemed to have submitted irrevocably to the jurisdiction and venue of this Court, and to have waived any objection thereto, for any proceeding arising out of this Stipulation and Order.

IT IS SO ORDERED on this the _____ day of August, 2008.

Hon. Robert W. Pratt
U.S. District Judge

IT IS SO AGREED AND STIPULATED.

By: /s/ Alex J. Luchenitser
Alex J. Luchenitser, Esq.*
On Behalf of Americans United for Separation of Church and State

Date: August 5, 2008

Ayesha N. Khan, Esq., Legal Director (appearing *pro hac vice*)
Alex J. Luchenitser, Esq., Senior Litigation Counsel* (appearing *pro hac vice*)
Americans United for Separation of Church and State
518 C Street NE
Washington, DC 20002
Phone: (202) 466-3234
Fax: (202) 466-2587
E-mail: khan@au.org / luchenitser@au.org
*lead counsel
Counsel for plaintiffs

By: /s/ Dean Stowers
Dean Stowers, Esq.
On Behalf of Rosenberg, Stowers, & Morse

Date: August 5, 2008

Dean Stowers, Esq.
Rosenberg, Stowers & Morse
1010 Insurance Exchange Building
505 Fifth Avenue
Des Moines, Iowa 50309
Phone: (515) 243-7600
Fax: (515) 243-0583
E-mail: deanstowers@aol.com
Cooperating Attorneys, Americans United for Separation of Church and State
Counsel for plaintiffs

By: /s/ Anthony F. Troy Date: August 5, 2008
Anthony F. Troy, Esq.
On Behalf of Prison Fellowship Ministries and InnerChange Freedom Initiative

Anthony F. Troy, Esq. (appearing *pro hac vice*)
Ashley L. Taylor, Esq. (appearing *pro hac vice*)
Megan C. Rahman, Esq. (appearing *pro hac vice*)
Michael E. Lacy, Esq. (appearing *pro hac vice*)
TROUTMAN SANDERS LLP
1111 East Main Street
P.O. Box 1122
Richmond, VA 23218-1122
Counsel for defendants Prison Fellowship Ministries and InnerChange Freedom Initiative

By: /s/ H. Loraine Wallace Date: August 5, 2008
H. Loraine Wallace, Esq.
On behalf of Terry Mapes, John Baldwin, Robyn Mills, Art Neu, David Erickson, Sheryl Griffith, Michael Coleman, and Michael Sadler

Gordon E. Allen, Esq., Deputy Attorney General (ret.)
H. Loraine Wallace, Esq., Assistant Attorney General
Special Litigation/Corrections
IOWA DEPARTMENT OF JUSTICE
Hoover State Office Building
Des Moines, IA 50319
Phone: (515) 281-4419
Fax: (515) 281-4209
Counsel for defendants Terry Mapes, et al.