

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

BRIAN A., et al.	)	
	)	
Plaintiffs,	)	Civ. Act. No. 3:00-0445
	)	Judge Todd J. Campbell
v.	)	Magistrate Judge Joe B. Brown
	)	
BILL HASLAM, et al.	)	
	)	
Defendants.	)	

**JOINT STIPULATION SEEKING COURT APPROVAL OF PROPOSED  
SEPTEMBER 2014 MODIFIED SETTLEMENT AGREEMENT AND EXIT PLAN**

1. Pursuant to Section XVIII.C.3 of the September 2013 Modified Settlement Agreement and Exit Plan (Dkt. No. 500), which remains in full force and effect, the parties hereby jointly file with the Court a proposed joint modification to the September 2013 Modified Settlement Agreement and Exit Plan that includes revisions in the identification of provisions as MAINTENANCE. These revisions are based upon the Monitoring Report of the Technical Assistance Committee (“TAC”) dated May 31, 2014 (Dkt. No. 516-1), negotiations between the parties and the TAC, and supplemental information provided by the TAC in a Supplement to the 2014 Monitoring Report, dated August 27, 2014, attached hereto as Exhibit A.
  
2. If approved, the proposed September 2014 Modified Settlement Agreement and Exit Plan, attached hereto as Exhibit B, will replace and supersede the September 2013 Modified Settlement Agreement and Exit Plan in its entirety. The parties request that the September 2014 Modified Settlement Agreement and Exit Plan be signed by the Court and entered as a separate docket entry in this action. Also attached hereto as Exhibit C,

for the Court's convenience, is a version of the September 2014 Modified Settlement Agreement and Exit Plan that shows the changes in MAINTENANCE designations in redline. As reflected in the three exhibits to this Joint Stipulation, through the processes set forth in Section XIII.C, approval is requested for fourteen (14) new provisions to be identified as MAINTENANCE: Sections IV.B.1, IV.B.3, V.A, V.D.4 , V.H , V.I, VIII.C.5.b, VIII.D.2, IX.B.2, IX.E (second sentence), XI.E.2, XI.E.3, XI.E.4, and XIII.C. No provisions are proposed to be removed from MAINTENANCE.

DATED: September 2, 2014  
Nashville, TN

**APPROVED FOR ENTRY:**

**ATTORNEYS FOR PLAINTIFFS:**

/s/ Ira Lustbader  
IRA LUSTBADER (*pro hac vice*)  
SARAH RUSSO (*pro hac vice*)  
CHILDREN'S RIGHTS, INC.  
330 Seventh Avenue, 4th Floor  
New York, NY 10001  
(212) 683-2210

/s/ David L. Raybin  
DAVID L. RAYBIN (TN BPR #003385)  
HOLLINS, RAYBIN AND WEISSMAN P.C.  
Suite 2200, Fifth Third Center  
424 Church Street  
Nashville, TN 37219  
(615) 256-6666

JACQUELINE B. DIXON (TN BPR #012054)  
WEATHERLY, MCNALLY AND DIXON, P.L.C.  
Suite 2260  
424 Church Street  
Nashville, TN 37219  
(615) 986-3377

**OF COUNSEL FOR PLAINTIFFS:**

ROBERT LOUIS HUTTON (TN BPR #15496)  
GLANKLER BROWN, PLLC  
Suite 1700, One Commerce Square  
Memphis, TN 38103  
(901) 525-1322

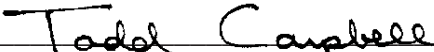
WADE V. DAVIES (TN BPR #016052)  
RITCHIE, DILLARD AND DAVIES  
606 W. Main Street, Suite 300  
Knoxville, TN 37902  
(865) 637-0661

**ATTORNEYS FOR DEFENDANTS:**

/s/ Martha A. Campbell  
MARTHA A. CAMPBELL (TN BPR #014022)  
Deputy Attorney General  
General Civil Division  
P. O. Box 20207  
Nashville, TN 37202  
(615) 741-6420

/s/ Jonathan P. Lakey  
JONATHAN P. LAKEY (TN BPR #16788)  
PIETRANGELO COOK, PLC  
6410 Poplar Avenue, Suite 190  
Memphis, TN 38119  
(901) 685-2662

**SO ORDERED:**

  
\_\_\_\_\_  
HONORABLE TODD J. CAMPBELL, U.S.D.J.    DATE:

**CERTIFICATE OF SERVICE**

I, Sarah Russo, hereby certify that, on September 2, 2014, a true and correct copy of this Joint Stipulation Seeking Court Approval of Proposed September 2014 Modified Settlement Agreement and Exit Plan in the case of *Brian A. v. Haslam* has been served on Defendants' counsel Martha A. Campbell, Deputy Attorney General, General Civil Division, P.O. Box 20207, Nashville, TN 37202, and Jonathan Lakey, Pietrangelo Cook, PLC, 6410 Poplar Avenue, Suite 190, Memphis, TN 38119, electronically by operation of the Court's electronic filing system.

DATED:                      September 2, 2014

/s/ Sarah Russo \_\_\_\_\_  
Sarah Russo