

**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.	)	

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**CORRECTED PROPOSED JOINT STIPULATED MODIFICATION OF  
SEPTEMBER 19, 2014 ORDER AND  
REQUEST FOR COURT APPROVAL**

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On September 19, 2014, the Court approved the parties' Stipulated One-Time Modification of Section XV.A of the September 2013 Modified Settlement Agreement and Exit Plan and Request for Court Approval, Dkt. No. 529, which provides in the final paragraph:

The modification set forth above shall be in addition to the TAC issuing a supplemental report on or before December 31, 2014, on provisions in the Exit Plan agreed upon by the parties and the TAC, provided that the parties and the TAC shall follow the procedures in Section XVIII.C regarding the identification of "Maintenance" provisions, and the filing of a proposed joint modification to the Exit Plan, following the production of a supplemental report.

Dkt. No. 529 at 2.

The parties and the TAC agree that additional time to complete the supplemental report will allow the TAC to provide a more robust assessment of performance. The parties and the TAC further agree that this additional time will not impact the timing of the subsequent TAC report, covering the twelve-month period from January 1, 2014 through and including December 31, 2014.

Accordingly, the parties agree to, and request the Court to approve, the following modifications to the final paragraph of Dkt. No. 529:

The modification set forth above shall be in addition to the TAC issuing a supplemental report on or before January 30, 2015, on provisions in the Exit Plan agreed upon by the parties and the TAC. The parties and the TAC shall complete the procedures in Section XVIII.C regarding the identification of "Maintenance" provisions, and the filing of a proposed joint modification to the Exit Plan, prior to the scheduled Status Conference on April 13, 2015.

All other terms of Dkt. No. 529 shall remain in full force and effect.

DATED: December 18, 2014  
Nashville, TN

**APPROVED FOR ENTRY:**

**ATTORNEYS FOR PLAINTIFFS:**

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**SO ORDERED:**

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

**CERTIFICATE OF SERVICE**

I, Sarah Russo, hereby certify that, on December 18, 2014, a true and correct copy of this Corrected Proposed Joint Stipulated Modification of September 19, 2014 Order and Request for Court Approval 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: December 18, 2014

/s/ Sarah Russo  
Sarah Russo