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TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

The Parties are to appear before this Honorable Court on February 29, 2016 for a Motions Hearing regarding the Preliminary Approval of the Class Action (the “Hearing”). Interveners, the Association for Childhood Education International (“ACEI”) and the Hill Foundation, Inc. (“Hill Foundation”), have no objection to Plaintiffs’ Motion. Indeed, given the particular circumstances surrounding the Parties’ settlement leading to Plaintiffs’ Motion, the Interveners have had significantly less involvement than the Plaintiffs and Defendants regarding the Motion. As both ACEI and the Hill Foundation are non-profit organizations, the cost that would be incurred by having counsel attend this Hearing would directly impact the organizations by diverting critical funds from their charitable operations. Accordingly, the Parties stipulate to the Interveners waiving their right to appear at the Hearing. With the Court’s permission, Counsel for Interveners will be available by telephone during the Hearing in the event the Court must reach them at the following numbers: primarily at (410) 347-9425 and, if unavailable at that number, then (443) 347-9449.

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DATED: February 26, 2016

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Dated: February 26, 2016

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Dated: February 26, 2016

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DECLARATION REGARDING CONCURRENCE

I, Scott O. Luskin, am the CM/ECF User whose identification and password are being used to file this: **STIPULATION RE:WAIVER OF APPEARANCE AT HEARING BY ASSOCIATION OF CHILDHOOD EDUCATION, INC. and THE HILL FOUNDATION, INC. AND [PROPOSED] ORDER GRANTED STIPULATION.** In compliance with L.R. 5-4.3.4 (a)(2)(i), I hereby attest that Kelly M. Klaus and Mark C. Rifkin have concurred in this filing’s content and have authorized its filing.

Dated: February 26, 2016

By: /s/ Scott O. Luskin
SCOTT O. LUSKIN