

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

United States of America,)	
)	
Plaintiff,)	
)	
v.)	Case 1:13-cv-11078-RGS
)	
Scott G. Baker and Robyn Baker)	
)	
Defendants.)	

**SETTLEMENT AGREEMENT REGARDING
ORDER ON THE DISTRIBUTION OF ESCROWED FUNDS, AND JOINT REQUEST
FOR ORDER REGARDING POSSIBLE FUTURE IMA DISTRIBUTIONS**

Plaintiff, United States of America, and Robyn Baker, by their undersigned attorneys, enter this settlement agreement with regard to compliance with the Court’s *Memorandum And Order On The Distribution Of Escrowed Funds* entered on September 22, 2017 (“9/22/2017 Order”) and jointly request that the Court enter an order as requested in paragraph 6 of this agreement. The terms are as follows:

1. In lieu of remitting to Robyn Baker 50% of \$599,078.77 or \$299,539.38, the United States shall, subject to paragraph 6 below, remit to her (through her attorneys) the sum of \$227,429.08, representing the \$269,429.08 sought in her original claim, which indicated that a portion of the escrowed funds were due Scott Baker alone for services to Design Decisions (Doc. 100), minus an offset of \$42,000 representing 50% of the \$84,000 received by Robyn Baker from the IMA bankruptcy trustee and not escrowed. This shall be deemed in full satisfaction of the United States’ obligation under the 9/22/2017 Order.
2. The United States waives any right to appeal the 9/22/2017 Order to contest the 50/50 division of the IMA bankruptcy claim proceeds (after receiving credit for the Scott Baker’s earnings as indicated in paragraph 1) or any other ruling in this case.
3. Robyn Baker waives any right to appeal the 9/22/2017 Order or any other ruling in this case.
4. This agreement does not alter the parties’ rights to their respective portions of the net sale proceeds of the property in New Hampshire or affect any other claims the parties may have

Allowed. R.B. Stearns 05/10-23-17.