


IN WITNESS WHEREOF, the undersigned have caused this Settlement

Agreement to be executed as of the dates set forth below:

FOR THE FREY DEFENDANTS:

FOR THE RANDOM HOUSE DEFENDANTS:

  
James Frey

Robert Sorrentino  
Senior Vice President, Taxes, Random House, Inc.

Date: 1/2/07

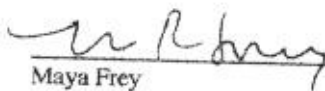
Date: \_\_\_\_\_

  
James Frey  
Big Jim Industries, Inc.

Robert Sorrentino  
President, Doubleday & Company, Inc.

Date: 1/2/07

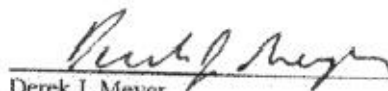
Date: \_\_\_\_\_

  
Maya Frey

Robert Sorrentino  
Vice President, Taxes, Random House VG, Inc.

Date: 1/2/07

Date: \_\_\_\_\_

  
Derek J. Meyer  
McDermott Will & Emery LLP  
227 West Monroe Street, Suite 4400  
Chicago, Illinois 60606  
Attorney for the Frey Defendants

Mark B. Blocker  
Sidley Austin LLP  
One South Dearborn  
Chicago, Illinois 60603  
Attorney for the Random House Defendants

Date: 1/2/07

Date: \_\_\_\_\_

IN WITNESS WHEREOF, the undersigned have caused this Settlement

Agreement to be executed as of the dates set forth below:

FOR THE FREY DEFENDANTS:

\_\_\_\_\_  
James Frey

Date: \_\_\_\_\_

\_\_\_\_\_  
James Frey  
Big Jim Industries, Inc.

Date: \_\_\_\_\_


\_\_\_\_\_  
Maya Frey

Date: \_\_\_\_\_

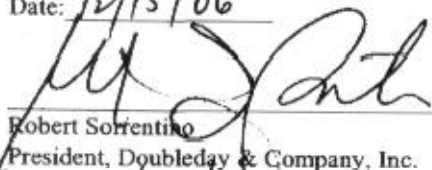
\_\_\_\_\_  
Derek J. Meyer  
McDermott Will & Emery LLP  
227 West Monroe Street, Suite 4400  
Chicago, Illinois 60606  
*Attorney for the Frey Defendants*

Date: \_\_\_\_\_

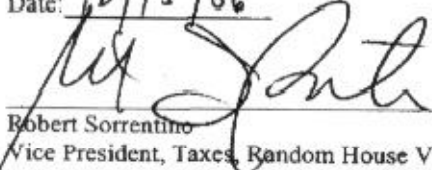
FOR THE RANDOM HOUSE DEFENDANTS:

  
\_\_\_\_\_  
Robert Sorrentino  
Senior Vice President, Taxes, Random House, Inc.


Date: 12/15/06

  
\_\_\_\_\_  
Robert Sorrentino  
President, Doubleday & Company, Inc.

Date: 12/15/06

  
\_\_\_\_\_  
Robert Sorrentino  
Vice President, Taxes, Random House VG, Inc.

Date: 12/15/06

  
\_\_\_\_\_  
Mark B. Blocker  
Sidley Austin LLP  
One South Dearborn  
Chicago, Illinois 60603  
*Attorney for the Random House Defendants*

Date: 12/28/2006

**FOR THE PLAINTIFFS:**

Marcia Vedral  
Plaintiff Marcia Vedral

Date: 12-6-06  
Larry D. Drury  
Larry D. Drury, Ltd.  
205 W. Randolph Street, Suite 1430  
Chicago, Illinois 60606  
*Proposed Co-Lead Class Counsel  
Attorney for Plaintiff Marcia Vedral*

Date: 12-6-06  
Plaintiff Jennifer Cohn

Date: \_\_\_\_\_  
Thomas Mullaney  
708 Third Avenue, Suite 2500  
New York, New York 10017  
Phone: (212) 223-0800  
*Liaison Class Counsel  
Attorneys for Plaintiff Jennifer Cohn*

Date: \_\_\_\_\_

Michele Snow  
Plaintiff Michele Snow

Date: 12-6-06  
Evan J. Smith  
Evan J. Smith, Esquire  
Brodsky & Smith, LLC  
Two Bala Plaza, Suite 602  
Bala Cynwyd, PA 19004  
(610) 667-6200  
*Proposed Co-Lead Class Counsel  
Attorney for Plaintiff Michele Snow*

Date: 12-6-06  
Plaintiff Ann Marie Strack

Date: \_\_\_\_\_  
Thomas A. Zimmerman, Jr.  
Zimmerman and Associates, P.C.  
100 West Monroe Street, Suite 1300  
Chicago, Illinois 60603  
*Attorney for Plaintiff Ann Marie Strack*

Date: \_\_\_\_\_

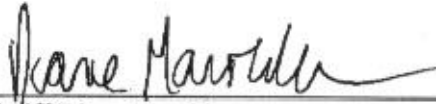
**FOR THE PLAINTIFFS:**

\_\_\_\_\_  
Plaintiff Marcia Vedral

Date: \_\_\_\_\_

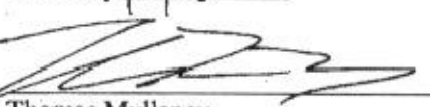
\_\_\_\_\_  
Larry D. Drury  
Larry D. Drury Ltd.  
205 W. Randolph Street, Suite 1430  
Chicago, Illinois 60606  
*Proposed Co-Lead Class Counsel  
Attorney for Plaintiff Marcia Vedral*

Date: \_\_\_\_\_



\_\_\_\_\_  
Plaintiff Diane Marolda

Date: 12/7/06

  
\_\_\_\_\_  
Thomas Mullaney  
708 Third Avenue, Suite 2500  
New York, New York 10017  
Phone: (212) 223-0800  
*Liaison Class Counsel  
Attorneys for Plaintiff Diane Marolda*

Date: 12.5.2006

\_\_\_\_\_  
Plaintiff Michele Snow

Date: \_\_\_\_\_

\_\_\_\_\_  
Evan J. Smith, Esquire  
Brodsky & Smith, LLC  
Two Bala Plaza, Suite 602  
Bala Cynwyd, PA 19004  
(610) 667-6200  
*Proposed Co-Lead Class Counsel  
Attorney for Plaintiff Michele Snow*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Ann Marie Strack

Date: \_\_\_\_\_

\_\_\_\_\_  
Thomas A. Zimmerman, Jr.  
Zimmerman and Associates, P.C.  
100 West Monroe Street, Suite 1300  
Chicago, Illinois 60603  
*Attorney or Plaintiff Ann Marie Strack*

Date: \_\_\_\_\_

**FOR THE PLAINTIFFS:**

\_\_\_\_\_  
Plaintiff Marcia Vedral

\_\_\_\_\_  
Plaintiff Michele Snow

Date: \_\_\_\_\_

Date: \_\_\_\_\_

\_\_\_\_\_  
Larry D. Drury  
Larry D. Drury Ltd.  
205 W. Randolph Street, Suite 1430  
Chicago, Illinois 60606  
*Proposed Co-Lead Class Counsel  
Attorney for Plaintiff Marcia Vedral*

\_\_\_\_\_  
Evan J. Smith, Esquire  
Brodsky & Smith, LLC  
Two Bala Plaza, Suite 602  
Bala Cynwyd, PA 19004  
(610) 667-6200  
*Proposed Co-Lead Class Counsel  
Attorney for Plaintiff Michele Snow*

Date: \_\_\_\_\_

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Jennifer Cohn

\_\_\_\_\_  
  
Plaintiff Ann Marie Strack

Date: \_\_\_\_\_

Date: 12-8-06


\_\_\_\_\_  
Thomas Mullaney  
708 Third Avenue, Suite 2500  
New York, New York 10017  
Phone: (212) 223-0800  
*Liaison Class Counsel  
Attorneys for Plaintiff Jennifer Cohn*

\_\_\_\_\_  
  
Thomas A. Zimmerman, Jr.  
Zimmerman and Associates, P.C.  
100 West Monroe Street, Suite 1300  
Chicago, Illinois 60603  
*Attorney for Plaintiff Ann Marie Strack*

Date: \_\_\_\_\_

Date: 12-11-2006

  
\_\_\_\_\_  
Plaintiff Jimmy Floyd

Date: 1/4/07  
  
\_\_\_\_\_

Alan S. Ripka  
Napoli Bern Ripka LLP  
115 Broadway  
New York, New York 10006  
*Attorney for Plaintiff Jimmy Floyd*

Date: December 5, 2006  
\_\_\_\_\_

\_\_\_\_\_  
Plaintiff Pilar More

Date: \_\_\_\_\_

Thomas E. Pakenas  
Dale and Pakenas  
641 W. Lake Street, Suite 400  
Chicago, Illinois 60661  
*Attorneys for Plaintiff Pilar More*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Sara Brackenrich

Date: \_\_\_\_\_

Vincent L. DiTommaso  
DiTommaso & Lubin, PC  
17W 220 22nd Street, Suite 200  
Oakbrook Terrace, Illinois 61081  
*Attorney for Plaintiff Sara Brackenrich*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Jill Giles

Date: \_\_\_\_\_

Alan J. Statman  
Colleen M. Hegge (of counsel)  
2900 Chemed Center  
255 East Fifth Street  
Cincinnati, Ohio 45202  
*Attorneys for Plaintiff Jill Giles*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Shera Paglinawan

Date: \_\_\_\_\_

Michael David Myers  
Myers & Company, P.L.L.C.  
1809 Seventh Avenue, Suite 700  
Seattle, Washington 98101  
*Attorney for Plaintiff Shera Paglinawan*

Date: \_\_\_\_\_

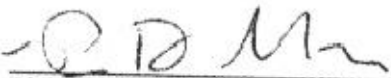


\_\_\_\_\_  
Plaintiff Jimmy Floyd

Date: \_\_\_\_\_

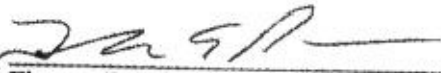
\_\_\_\_\_  
Alan S. Ripka  
Napoli Bern Ripka LLP  
115 Broadway  
New York, New York 10006  
*Attorney for Plaintiff Jimmy Floyd*

Date: 11/29/06



\_\_\_\_\_  
Plaintiff Pilar More

Date: 11/29/06



\_\_\_\_\_  
Thomas E. Pakenas  
Dale and Pakenas  
641 W. Lake Street, Suite 400  
Chicago, Illinois 60661  
*Attorneys for Plaintiff Pilar More*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Sara Brackenrich

Date: \_\_\_\_\_

\_\_\_\_\_  
Vincent L. DiTommaso  
DiTommaso & Lubin, PC  
17W 220 22nd Street, Suite 200  
Oakbrook Terrace, Illinois 61081  
*Attorney for Plaintiff Sara Brackenrich*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Jill Giles

Date: \_\_\_\_\_

\_\_\_\_\_  
Alan J. Statman  
Colleen M. Hegge (of counsel)  
2900 Chemed Center  
255 East Fifth Street  
Cincinnati, Ohio 45202  
*Attorneys for Plaintiff Jill Giles*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Shera Paglinawan

Date: \_\_\_\_\_

\_\_\_\_\_  
Michael David Myers  
Myers & Company, P.L.L.C.  
1809 Seventh Avenue, Suite 700  
Seattle, Washington 98101  
*Attorney for Plaintiff Shera Paglinawan*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Jimmy Floyd

Date: \_\_\_\_\_

\_\_\_\_\_  
Alan S. Ripka  
Napoli Born Ripka LLP  
115 Broadway  
New York, New York 10006  
*Attorney for Plaintiff Jimmy Floyd*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Pilar More

Date: \_\_\_\_\_

\_\_\_\_\_  
Thomas E. Pakenas  
Dale and Pakenas  
641 W. Lake Street, Suite 400  
Chicago, Illinois 60661  
*Attorneys for Plaintiff Pilar More*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Jill Giles

Date: \_\_\_\_\_

\_\_\_\_\_  
Alan J. Statman  
Colleen M. Hegge (of counsel)  
2900 Chemed Center  
255 East Fifth Street  
Cincinnati, Ohio 45202  
*Attorneys for Plaintiff Jill Giles*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Shera Paglinawan

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Wendy Shaw

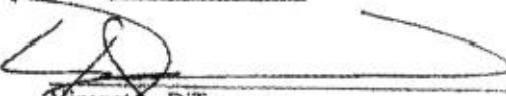
Date: \_\_\_\_\_

\_\_\_\_\_  
Michael David Myers  
Myers & Company, P.L.L.C.  
1809 Seventh Avenue, Suite 700  
Seattle, Washington 98101  
*Attorney for Plaintiff Shera Paglinawan*

Date: \_\_\_\_\_

  
\_\_\_\_\_  
Plaintiff Sara Brackenrich

Date: 20 Nov. 06

  
\_\_\_\_\_  
Vincent DiTommaso  
DiTommaso & Lubin, PC



\_\_\_\_\_  
Plaintiff Jimmy Floyd

Date: \_\_\_\_\_

\_\_\_\_\_  
Alan S. Ripka  
Napoli Bern Ripka LLP  
115 Broadway  
New York, New York 10006  
*Attorney for Plaintiff Jimmy Floyd*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Pilar More

Date: \_\_\_\_\_

\_\_\_\_\_  
Thomas E. Pakenas  
Dale and Pakenas  
641 W. Lake Street, Suite 400  
Chicago, Illinois 60661  
*Attorneys for Plaintiff Pilar More*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Sara Brackentich

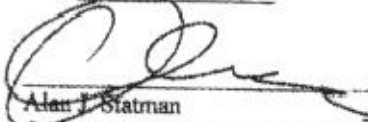
Date: \_\_\_\_\_

\_\_\_\_\_  
Vincent L. DiTommaso  
DiTommaso & Lubin, PC  
17W 220 22nd Street, Suite 200  
Oakbrook Terrace, Illinois 61081  
*Attorney for Plaintiff Sara Brackentich*

Date: \_\_\_\_\_

*Jill Giles / by her attorney A.J.C. Aust*  
\_\_\_\_\_  
Plaintiff Jill Giles

Date: 12-7-06

  
\_\_\_\_\_  
Alan J. Statman  
Colleen M. Hegge (of counsel)  
2900 Chemed Center  
255 East Fifth Street  
Cincinnati, Ohio 45202  
*Attorneys for Plaintiff Jill Giles*

Date: 12-7-06

\_\_\_\_\_  
Plaintiff Shera Paginawan

Date: \_\_\_\_\_

\_\_\_\_\_  
Michael David Myers  
Myers & Company, P.L.L.C.  
1809 Seventh Avenue, Suite 700  
Seattle, Washington 98101  
*Attorney for Plaintiff Shera Paginawan*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Jimmy Floyd

Date: \_\_\_\_\_

\_\_\_\_\_  
Alan S. Ripka  
Napoli Bern Ripka LLP  
115 Broadway  
New York, New York 10006  
*Attorney for Plaintiff Jimmy Floyd*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Pilar More

Date: \_\_\_\_\_

\_\_\_\_\_  
Thomas E. Pakenas  
Dale and Pakenas  
641 W. Lake Street, Suite 400  
Chicago, Illinois 60661  
*Attorneys for Plaintiff Pilar More*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Sara Brackenrich

Date: \_\_\_\_\_

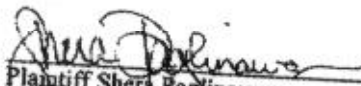
\_\_\_\_\_  
Vincent L. DiTommaso  
DiTommaso & Lubin, PC

\_\_\_\_\_  
Plaintiff Jill Giles

Date: \_\_\_\_\_

\_\_\_\_\_  
Alan J. Statman  
Colleen M. Hegge (of counsel)  
2900 Chemed Center  
255 East Fifth Street  
Cincinnati, Ohio 45202  
*Attorneys for Plaintiff Jill Giles*

Date: \_\_\_\_\_

\_\_\_\_\_  
  
Plaintiff Shera Paglinawan

Date: 3 Dec. 2006

\_\_\_\_\_  
Plaintiff Wendy Shaw

Date: \_\_\_\_\_

\_\_\_\_\_  
  
Michael David Myers  
Myers & Company, P.L.L.C.  
1809 Seventh Avenue, Suite 700  
Seattle, Washington 98101  
*Attorney for Plaintiff Shera Paglinawan*

Date: 12.3.2006

\_\_\_\_\_  
Plaintiff Jimmy Floyd

Date: \_\_\_\_\_

\_\_\_\_\_  
Alan S. Ripka  
Napoli Bern Ripka LLP  
115 Broadway  
New York, New York 10006  
*Attorney for Plaintiff Jimmy Floyd*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Pilar More

Date: \_\_\_\_\_

\_\_\_\_\_  
Thomas E. Pakenas  
Dale and Pakenas  
641 W. Lake Street, Suite 400  
Chicago, Illinois 60661  
*Attorneys for Plaintiff Pilar More*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Sara Brackenrich

Date: \_\_\_\_\_

\_\_\_\_\_  
Vincent L. DiTommaso  
DiTommaso & Lubin, PC

\_\_\_\_\_  
Plaintiff Jill Giles

Date: \_\_\_\_\_

\_\_\_\_\_  
Alan J. Statman  
Collect M. Hegge (of counsel)  
2900 Chemed Center  
255 East Fifth Street  
Cincinnati, Ohio 45202  
*Attorneys for Plaintiff Jill Giles*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Shera Paginawan

Date: \_\_\_\_\_

\_\_\_\_\_  
  
Plaintiff Wendy Shaw

Date: 12/2/06

\_\_\_\_\_  
Michael David Myers  
Myers & Company, P.L.L.C.  
1809 Seventh Avenue, Suite 700  
Seattle, Washington 98101  
*Attorney for Plaintiff Shera Paginawan*

Date: \_\_\_\_\_